

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Marvin Faulkner and

Samuel C. Umunna;

[Plaintiff(s) herein, come

Individually of themselves];

Plaintiff(s),

v.

ANNA M. LOFTUS;

WILLIAM FARROW;

PIERCE & ASSOCIATES;

FEDERAL DEPOSIT

INSURANCE CORP;

URBAN PARTNERSHIP BANK;

SHOREBANK;

JENNER & BLOCK LLP;

CHUHAK & TECSON, P.C.;

MICHAEL A. EURICH;

VILLA CAPITAL PROPERTIES;

GEORGE F. SCULLY JR.;

ELIZABETH LYONS;

DARRLY B. SIMKO;

CITY OF CHICAGO;

ALFRED M. SWANSON JR.;

LASALLE BANK NATIONAL, as Trustee)

for Certificate Holders of Bear Stearns Asset)

Backed Securities I, LLC, Asset-Backed;)

Certificates, Series 2007-HE6;)

MORTGAGE ELECTRONIC)

REGISTRATION SYSTEMS;)

ENCORE CREDIT;)

EMC MORTGAGE CORPORATION;)

BEAR STEARNS ASSET BACKED)

SECURITIES I LLC;)

NATIONSTAR MORTGAGE, LLC;)

CITIMORTGAGE, INC.;)

BEAR STEARNS ASSET BACKED)

SECURITIES I TRUST 2007-HE6;)

FEDERAL NATIONAL MORTGAGE)

ASSOCIATION;)

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CIVIL ACTION

Case No.: 16-cv-2432

ALLEGED COUNT(S) UNDER:

-RICO

ALLEGED COUNT(S) UNDER

CLASS-ACTION:

-42 U.S.C §1983

-18 U.S.C. §242

-HATE CRIME

-§1981-CIVIL RIGHTS VIOLATIONS

-§1985(3) DEPRIVATION

-INTENTIONAL TORT

-INTIMIDATION

-PIERCED CORPORATE VEIL

-UNJUST ENRICHMENT

-§1986 CONSPIRACY

-EMOTIONAL DISTRESS

HONORABLE JUDGE

JOHN W. DARRAH

MAG. JUDGE

FILED

JUL 11 2016

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**PLAINTIFFS' DEMAND
FOR A TRIAL BY JURY**

ORIGINAL

FIRST FRANKLIN MORTGAGE;)
US BANK NATIONAL ASSOCIATES;)
MICHAEL N. VARAK;)
BRYAN GOMEZ;)
KOVITZ, SHIFRIN & NESBIT)
LAW OFFICE;)
MEREDITH FREEMAN;)
EDWARD J. LESNIAK;)
ALEXANDER D. MARKS;)
PAMELA MCLEAN MEYERSON;)
BURKE, WARREN, MACKAY &)
SERRITELLA, P.C.;)
CHRISTINA PLACE II)
CONDOMINIUM ASSOCIATION;)
RAYMOND W. MITCHELL;)
IRWIN J. SOLGANICK;)
ALEXANDER P. WHITE;)
TIMOTHY L. ROWELL;)
STARR, BEJGIERT, ZINK & ROWELLS;)
CODILIS & ASSOCIATES;)
COOK COUNTY SHERIFF'S)
POLICE DEPARTMENT;)
SONIA PASQUESI;)
JOHN AVGERINOS;)
PAUL AVGERINOS;)
SAMANTHA L. BABCOCK;)
STEVEN E. ANDERSON;)
ERIK HUBBARD;)
HAUSELMAN, RAPPIN &)
OLSWANG, LTD;)
RODERICK PIERCE;)
[All government defendant(s) are)
being sued in his/her Individual and/or)
their Official capacity],)
Defendant(s),)

AMENDED VERIFIED COMPLAINT

COMES NOW the Plaintiff(s) (*separately and jointly*); Marvin Faulkner
and Samuel C. Umunna (Collectively, "*The Plaintiffs*"), In part or/and in whole, as
individually are alleging, herein, this filed "Amended Verified Complaint" and
complaining against Defendant(s) ANNA M. LOFTUS; WILLIAM FARROW; PIERCE

ORIGINAL

& ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC.; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; STEVEN E. ANDERSON; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD and RODERICK PIERCE. (collectively, "*the Defendants*") (*All* individual Defendant(s) named herein are sued in their official and individual capacities and *all* Municipal Governmental entities named

herein, as liken are being sued). Plaintiff(s) with their Federal Question; herein and hereafter, being and alleging the illicit activities of the defendant(s), set forth, herein this matter, upon information and belief and alleges as follow:

I. JURISDICTION AND VENUE:

1. This Court has jurisdiction under *18 U.S.C. §1964 (c)* (CIVIL RICO). This Court also has supplemental jurisdiction over Plaintiffs' state law claims under *28 USC §1367* as these claims are intricately related to Plaintiffs' RICO claim and form part of the same case or controversy. Further, this Court has jurisdiction of the claim herein pursuant to, as aforementioned, *18 USCA §1964(c)* and *28 USCA §1331*. This civil action arises under the laws of the United States. Plaintiff is alleging a violation of their rights under Title IX of the Organized Crime Control Act of 1970, as amended, *18 USCA §§1961 et seq.*;

2. This Court has jurisdiction over the subject matter of this action pursuant to *28 U.S.C § 1331* and *18 U.S.C. §* for Plaintiff's claims arising under *RICO, §§1961 et seq.*

3. Jurisdiction in this case arises under *28 U.S.C. §1332*, based on diversity of citizenship between the Plaintiffs and the Defendants, and the amount in controversy exceeding of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) - Exclusive of interest and costs;

4. This Court has subject matter jurisdiction over this action pursuant to *28 U.S.C § 1331*, as this is a civil action arising under the Constitution, laws, or treaties of the United States;

5. This action is brought pursuant to *42 U.S.C. §1983* to redress the deprivation *under color of law* of Plaintiffs' rights as secured by the United States Constitution

deprivation Faulkner's and Umunna's Rights' *under* Federal and State Law;

6. Venue is proper in this district pursuant to 28 U.S.C. §1391 (e) (1) and (2), because a substantial part of the events giving rise to this claim occurred in this district in which one or more Defendant(s) is/are officer or employee of the United States or any agency thereof acting in his *official capacity* or *under color of legal authority*, or an agency of the United States or the United States, may, except as otherwise provided by law, be brought in any judicial district pursuant to 28 U.S.C. §1391 (e) (1) and (2);

7. Venue herein is proper under 18 USCA §1965(a) 28 USCA §1391(b);

8. Venue is proper in the United States District Court for the Northern District of Illinois pursuant to 28 U.S.C. §1391; because, the unlawful conduct alleged herein was committed and continues to occur within the boundaries of the Northern District of Illinois;

9. This venue is proper in the United States District Court for the Northern District of Illinois because one or more of the Defendant(s) is/are agent(s) or independent agent(s) of the United States Government.

II. PARTIES

A. PLAINTIFF(S) :

10. **Marvin Faulkner (Also, (Mr.) Faulkner or Plaintiff Faulkner),** *Plaintiff*, is a citizen of the United States, and is a resident of the State of Illinois.

11. **Samuel C. Umunna (Also, (Mr.) Umunna or Plaintiff Umunna),** *Plaintiff*, is a citizen of the United States, and is a resident of the State of Illinois.

B. DEFENDANT(S) :

12. **ANNA M. LOFTUS (Also, (Judge) Loftus or Defendant Loftus), Defendant**, is a citizen of the United States, and is a resident of the State of Illinois.

A. **LOFTUS** is responsible and can be held liable for her wrongful acts regarding and in relation to herself, her employees and agents; but, not limited thereto.

B. **LOFTUS** is being sued in her individual and in her official capacities.

C. **LOFTUS** was acting under the authority of her position as “Judge” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **LOFTUS** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook (But; not limited, thereto).

13. **WILLIAM FARROW (Also, (Mr.) Farrow or Defendant Farrow), Defendant**, is a citizen of the United States, and is a resident of the State of Illinois.

A. **FARROW** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **FARROW** is being sued in his individual and in his official capacities.

C. **FARROW** was acting under the authority of his position as a “Banker” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **FARROW** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited thereto).

14. **PIERCE & ASSOCIATES** (Also, Peirce or Defendant Peirce), *Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **PIERCE** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **PIERCE** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **PIERCE** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. **PIERCE** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

15. **FEDERAL DEPOSIT INSURANCE CORPORATION** (Also, **FDIC** or **Defendant FDIC**), *Defendant*, is a corporation existing under and by virtue of the laws of the United States.

A. **FDIC** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **FDIC** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **FDIC** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of

law". (But; not limited, thereto).

D. **FDIC** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

16. **URBAN PARTNERSHIP BANK (Also, UPB or Defendant UPB),** *Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois; State of Michigan and the State of Ohio.

A. **UPB** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **UPB** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **UPB** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. **UPB** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

17. **SHOREBANK (Also, Defendant ShoreBank),** *Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois; State of Michigan and the State of Ohio.

A. **SHOREBANK** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or

shareholders (But; not limited, thereto).

B. SHOREBANK is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. SHOREBANK was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. SHOREBANK is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

18. **JENNER & BLOCK LLP (Also, J&B or Defendant J&B), Defendant**, is a corporation existing under and by virtue of the laws of the State of Illinois; the State of Los Angeles; the State of New York; and the State of Washington DC.

A. J&B is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. J&B is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. J&B was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. J&B is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

19. **CHUHAK & TECSON, P.C. (Also, C&T or Defendant C&T), Defendant**, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **C&T** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **C&T** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **C&T** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. **C&T** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

20. **MICHAEL A. EURICH (Also, (Mr.) Eurich or Defendant Eurich), Defendant**, is a citizen of the United State, and is a resident of the State of Illinois.

A. **EURICH** is responsible and can be held liable*for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **EURICH** is being sued in his individual and in his official capacities.

C. **EURICH** was acting under the authority of his position as "Attorney" in the Circuit Court of Cook County, under regulations, customs, usage's of the State of Illinois, County of Cook, and acting "under the color of law".

D. **EURICH** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook (but; not limited,

thereto).

21. **VILLA CAPITAL PROPERTIES (Also, VCP or Defendant VCP), Defendant,** is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **VCP** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **VCP** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **VCP** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. **VCP** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

22. **GEORGE F. SCULLY JR. (Also, (Judge) Scully Jr. or Defendant Scully), Defendant,** is a citizen of the United States, and is a resident of the States of Illinois.

A. **SCULLY JR.** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **SCULLY JR.** is being sued in his individual and in his official capacities.

C. **SCULLY JR.** was acting under the authority of his position as "Judge" in the Circuit Court of Cook County, under regulations, customs, usage's of the State of

Illinois, County of Cook, and acting “under the color of law”.

D. **SCULLY JR.** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

23. **ELIZABETH LYONS (Also, (Miss) Lyons or Defendant Lyons)**, Defendant, is a citizen of the United States, and is a resident of the States of Illinois.

A. **LYONS** is responsible and can be held liable for her wrongful acts regarding and in relation to herself, her employees and agents; but, not limited, thereto.

B. **LYONS** is being sued in her individual and in her official capacities.

C. **LYONS** was acting under the authority of her position as “Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **LYONS** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

24. **DARRLY B. SIMKO (Also, (Judge) Simko or Defendant Simko)**, Defendant, is a citizen of the United States, and is a resident of the States of Illinois.

A. **SIMKO** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **SIMKO** is being sued in his individual and in his official capacities.

C. **SIMKO** was acting under the authority of his position as “Judge” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **SIMKO** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

25. **CITY OF CHICAGO (Also, “CHICAGO”), Defendant**, is a metropolitan, govern by the State of Illinois.

A. **CHICAGO** is responsible and can be held liable for *its* wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **CHICAGO** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **CHICAGO** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois “under the color of law”. (But; not limited, thereto).

D. **CHICAGO** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

26. **ALFRED M. SWANSON JR. (Also, (Judge) Swanson Jr. or Defendant Swanson Jr.), Defendant**, is a citizen of the United States, and is a resident of the States of Illinois.

A. **SWANSON JR.** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **SWANSON JR.** is being sued in his individual and in his official

capacities.

C. **SWANSON JR.** was acting under the authority of his position as “Judge” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **SWANSON JR.** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

27. **LASALLE BANK NATIONAL, as Trustee for Certificate Holders of Bear Stearns Asset Backed Securities I, LLC, Asset-Backed (Also, LaSalle Bank or Defendant LaSalle Bank), Defendant,** is a corporation existing under and by virtue of the laws of the States of Illinois.

A. **LASALLE BANK** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **LASALLE BANK** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **LASALLE BANK** was acting under the authority, regulations, customs, and usage’s of laws in the City of Chicago, County of Cook, State of Illinois “under the color of law”. (But; not limited, thereto).

D. **LASALLE BANK** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

28. **MORTGAGE ELECTRONIC REGISTRATION SYSTEMS (Also, MERS or**

Defendant MERS), *Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **MERS** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **MERS** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **MERS** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "*under the color of law*". (But; not limited, thereto).

D. **MERS** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

29. **ENCORE CREDIT (Also, Encore or Defendant Encore)**, *Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **ENCORE** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **ENCORE** is doing business in the State of Illinois, City of Chicago, in the County of Cook and continues doing business therein.

C. **ENCORE** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "*under the color of law*". (But; not limited, thereto).

D. **ENCORE** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

30. **EMC MORTGAGE CORPORATION (Also, EMC or Defendant EMC),** Defendant, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **EMC** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **EMC** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **EMC** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. **EMC** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

31. **BEAR STEARNS ASSET BACKED SECURITIES I LLC (Also, Bear Stearns or Defendant Bear Stearns),** Defendant, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **BEAR STEARNS** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **BEAR STEARNS** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **BEAR STEARNS** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois **"under the color of law"**. (But; not limited, thereto).

D. **BEAR STEARNS** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

32. **NATIONSTAR MORTGAGE, LLC.**, (Also, Nationstar or Defendant Nationstar), *Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **NATIONSTAR** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **NATIONSTAR** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **NATIONSTAR** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois **"under the color of law"**. (But; not limited, thereto).

D. **NATIONSTAR** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

33. **CITIMORTGAGE, INC.**, (Also, Citimortgage or Defendant Citimortgage),

Defendant, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **CITIMORTGAGE** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **CITIMORTGAGE** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **CITIMORTGAGE** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. **CITIMORTGAGE** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

34. **BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6, A NEW YORK COMMON LAW TRUST ASSOCIATES (Also, Bearn Stearns Trust 2007-HE6 or Defendant Bear Stearns Trust 2007-HE6)**, *Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **BEARN STEARNS TRUST 2007-HE6** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **BEARN STEARNS TRUST 2007-HE6** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **BEARN STEARNS TRUST 2007-HE6** was acting under the

authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois **"under the color of law"**. (But; not limited, thereto).

D. BEARN STEARNS TRUST 2007-HE6 is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

35. **FEDERAL NATIONAL MORTGAGE ASSOCIATION (Also, Federal Mortgage or Defendant Federal Mortgage), Defendant**, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. FEDERAL MORTGAGE is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. FEDERAL MORTGAGE is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. FEDERAL MORTGAGE was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois **"under the color of law"**. (But; not limited, thereto).

D. FEDERAL MORTGAGE is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

36. **FIRST FRANKLIN MORTGAGE (Also, First Franklin or Defendant First Franklin), Defendant**, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. FIRST FRANKLIN is responsible and can be held liable for its

wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. FIRST FRANKLIN is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. FIRST FRANKLIN was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois **"under the color of law"**. (But; not limited, thereto).

D. FIRST FRANKLIN is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

37. **US BANK NATIONAL ASSOCIATES (Also, US Bank or Defendant US Bank), Defendant**, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. US BANK is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. US BANK is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. US BANK was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois **"under the color of law"**. (But; not limited, thereto).

D. US BANK is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited,

thereto).

38. _____ (Also, (Judge) _____ or Defendant _____),

Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. _____ is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. _____ is being sued in his individual and in his official capacities.

C. _____ was acting under the authority of his position as “_____” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. _____ is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

39. **MICHAEL N. VARAK** (Also, (Mr.) **Varak** or **Defendant Varak**), Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **VARAK** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **VARAK** is being sued in his individual and in his official capacities.

C. **VARAK** was acting under the authority of her position as “Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **VARAK** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

40. **BRYAN GOMEZ (Also, (Mr.) Gomez or Defendant Gomez), Defendant**, is a citizen of the United States, and is a resident of the State of Illinois.

A. **GOMEZ** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **GOMEZ** is being sued in his individual and in his official capacities.

C. **GOMEZ** was acting under the authority of his position as “Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **GOMEZ** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited thereto.

41. **KOVITZ, SHIFRIN & NESBIT LAW OFFICE (Also, KS&N law office or Defendant KS&N law office), Defendant**, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **KS&N law office** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **KS&N law office** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **KS&N law office** was acting under the authority, regulations, customs, and usage’s of laws in the City of Chicago, County of Cook, State of Illinois “under the color of law”. (But; not limited, thereto).

D. **KS&N law office** is subject to the federal laws governing the United

States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

42. **MEREDITH FREEMAN (Also, (Mrs.) Freeman or Defendant Freeman),** Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **FREEMAN** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **FREEMAN** is being sued in his individual and in his official capacities.

C. **FREEMAN** was acting under the authority of his position as “Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook and acting “under the color of law”.

D. **FREEMAN** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

43. **EDWARD J. LESNIAK (Also, (Mr.) Lesniak or Defendant Lesniak),** Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **LESNIAK** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited thereto.

B. **LESNIAK** is being sued in his individual and in his official capacities.

C. **LESNIAK** was acting under the authority of his position as “Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **LESNIAK** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

44. **ALEXANDER D. MARKS (Also, (Mr.) Marks or Defendant Marks),** Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **MARKS** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **MARKS** is being sued in his individual and in his official capacities.

C. **MARKS** was acting under the authority of his position as “Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **MARKS** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

45. **PAMELA MCLEAN MEYERSON (Also, (Judge) Meyerson or Defendant Meyerson),** Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **MEYERSON** is responsible and can be held liable for her wrongful acts regarding and in relation to herself, her employees and agents; but, not limited, thereto.

B. **MEYERSON** is being sued in her individual and in her official capacities.

C. **MEYERSON** was acting under the authority of her position as “Judge”

in the Circuit Court of Cook County, under regulations, customs, usage's of the State of Illinois, County of Cook, and acting "under the color of law".

D. MEYERSON is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

46. BURKE, WARREN, MACKAY & SERRITELLA, P.C.; (Also, BWM&S or Defendant BWM&S), Defendant, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. BWM&S is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. BWM&S is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. BWM&S was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. BWM&S is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

47. CHRISTINA PLACE II CONDOMINIUM ASSOCIATION (Also, Christina Place II or Defendant Christina Place II), Defendant, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. CHRISTINA PLACE II is responsible and can be held liable for its

wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. CHRISTINA PLACE II is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. CHRISTINA PLACE II was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois **"under the color of law"**. (But; not limited, thereto).

D. CHRISTINA PLACE II is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

48. RAYMOND W. MITCHELL; (Also, (Judge) Mitchell or Defendant Mitchell), Defendant, is a citizen of the United State, and is a resident of the State of Illinois.

A. MITCHELL is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. MITCHELL is being sued in his individual and in his official capacities.

C. MITCHELL was acting under the authority of his position as **"Judge"** in the Circuit Court of Cook County, under regulations, customs, usage's of the State of Illinois, County of Cook, and acting **"under the color of law"**.

D. MITCHELL is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

49. **IRWIN J. SOLGANICK; (Also, (Judge) Solganick or Defendant Solganick),**
Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **SOLGANICK** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **SOLGANICK** is being sued in his individual and in his official capacities.

C. **SOLGANICK** was acting under the authority of his position as “Judge” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **SOLGANICK** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

50. **ALEXANDER P. WHITE; (Also, (Judge) White or Defendant White),**
Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **WHITE** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **WHITE** is being sued in his individual and in his official capacities.

C. **WHITE** was acting under the authority of his position as “Judge” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **WHITE** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook (But; not limited,

thereto).

51. **TIMOTHY L. ROWELL; (Also, (Mr.) Rowell or Defendant Rowell),**

Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **ROWELL** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **ROWELL** is being sued in his individual and in his official capacities.

C. **ROWELL** was acting under the authority of his position as “Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **ROWELL** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook (But; not limited, thereto).

52. **STARR, BEJGIET, ZINK & ROWELL; (Also, SBZ&R or Defendant**

SBZ&R), Defendant, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **SBZ&R** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **SBZ&R** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **SBZ&R** was acting under the authority, regulations, customs, and usage’s of laws in the City of Chicago, County of Cook, State of Illinois “under the color

of law". (But; not limited, thereto).

D. **SBZ&R** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

53. **CODILIS & ASSOCIATES: (Also, Codilis or Defendant Codilis), Defendant,** is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **CODILIS** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. **CODILIS** is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. **CODILIS** was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. **CODILIS** is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

54. **COOK COUNTY SHERIFF'S POLICE DEPARTMENT; (Also, Cook County Sheriff's Police or Defendant Cook County Sheriff's Police), Defendant,** is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **COOK COUNTY SHERIFF'S POLICE** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders (But; not limited, thereto).

B. COOK COUNTY SHERIFF'S POLICE is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. COOK COUNTY SHERIFF'S POLICE was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. COOK COUNTY SHERIFF'S POLICE is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

55. **SONIA PASQUESI; (Also, (Miss) Pasquesi or Defendant Pasquesi),** Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. PASQUESI is responsible and can be held liable for her wrongful acts regarding and in relation to herself, her employees and agents (But; not limited, thereto).

B. PASQUESI is being sued in her individual and in her official capacities.

C. PASQUESI was acting under the authority of her position as "Attorney" in the Circuit Court of Cook County, under regulations, customs, usage's of the State of Illinois, County of Cook, and acting "under the color of law".

D. PASQUESI is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

56. **JOHN AVGERINOS; (Also, (Mr.) John Avgerinos or Defendant John Avgerinos),** Defendant, is a citizen of the United States, and is a resident of the State of

Indiana.

A. **JOHN AVGERINOS** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **JOHN AVGERINOS** is being sued in his individual and in his official capacities.

C. **JOHN AVGERINOS** was acting under the authority of his position as “Businessman” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **JOHN AVGERINOS** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

57. **PAUL AVGERINOS; (Also, (Mr.) P. Avgerinos or Defendant P. Avgerinos),** Defendant, is a citizen of the United States, and is a resident of the State of Indiana.

A. **PAUL AVGERINOS** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **PAUL AVGERINOS** is being sued in his individual and in his official capacities.

C. **PAUL AVGERINOS** was acting under the authority of her position as “Businessman” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **PAUL AVGERINOS** is subject to the federal laws governing the

United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook;
but, not limited, thereto.

58. **SAMANTHA L. BABCOCK; (Also, (Miss.) Babcock or defendant**

Babcock), Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **BABCOCK** is responsible and can be held liable for her wrongful acts regarding and in relation to herself, her employees and agents; but, not limited, thereto.

B. **BABCOCK** is being sued in her individual and in her official capacities.

C. **BABCOCK** was acting under the authority of her positioned of herself to be an Attorney but according to the ARDC Lawyer Search Results as of June 14, 2016 **not** found to be a licensed *Attorney in Illinois*” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting **“under the color of law”**.

D. **BABCOCK** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

59. **STEVEN E. ANDERSON; (Also, (Mr.) Anderson or Defendant Anderson)**, Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **ANDERSON** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **ANDERSON** is being sued in his individual and in his official capacities.

C. **ANDERSON** was acting under the authority of his position as

“Attorney” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **ANDERSON** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

60. **ERIK HUBBARD (Also, (Mr.) Hubbard or Defendant Hubbard),** Defendant, is a citizen of the United States, and is a resident of the State of Illinois.

A. **HUBBARD** is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. **HUBBARD** is being sued in his individual and in his official capacities.

C. **HUBBARD** was acting under the authority of her position as “Receiver/Businessman” in the Circuit Court of Cook County, under regulations, customs, usage’s of the State of Illinois, County of Cook, and acting “under the color of law”.

D. **HUBBARD** is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

61. **HAUSELMAN, RAPPIN & OLSWANG, LTD (Also, HR&O, Ltd. or Defendant HR&O, Ltd.),** Defendant, is a corporation existing under and by virtue of the laws of the State of Illinois.

A. **HR&O, Ltd.** is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or

shareholders (But; not limited, thereto).

B. HR&O, Ltd. is doing business in the State of Illinois, City of Chicago in the County of Cook and continues doing business therein.

C. HR&O, Ltd. was acting under the authority, regulations, customs, and usage's of laws in the City of Chicago, County of Cook, State of Illinois "under the color of law". (But; not limited, thereto).

D. HR&O, Ltd. is subject to the federal laws governing the United States of America, State of Illinois, City of Chicago in the County of Cook (But; not limited, thereto).

62. **RODERICK PIERCE; (Also, (Det.) Pierce or Defendant Pierce), Defendant,** is a citizen of the United States, and is a resident of the State of Illinois.

A. PIERCE is responsible and can be held liable for his wrongful acts regarding and in relation to himself, his employees and agents; but, not limited, thereto.

B. PIERCE is being sued in his individual and in his official capacities.

C. PIERCE was acting under the authority of his position as "Cook County Detective" in the Circuit Court of Cook County, under regulations, customs, usage's of the State of Illinois, County of Cook, and acting "under the color of law".

D. PIERCE is subject to the federal laws governing the United States of America, State of Illinois, CITY OF CHICAGO in the County of Cook; but, not limited, thereto.

63. intentionally left blank

64. intentionally left blank

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66. All individual Defendants herein are being sued in their official and individual capacities and all Municipal Governmental entities herein, defendant(s) are being sued).

(a). **Defendants** mean all defendant(s) collectively.

III. PARTY AND NON-PARTY WITNESSES IN THEIR PERSONAL AND/OR OFFICIAL CAPACITY:

67. **Dorothy Brown**: (*Also, Brown*) is a citizen of the United States, and is a resident of the State of Illinois.

A. **Abbey Fishman Romanek**: (*Also, Romanek*) is a citizen of United States, and is a resident of the State of Illinois.

B. **(Last name) Carter**: (*Also, Carter*) is a citizen of the United States, and is a resident of the State of Illinois.

C. **David B. Atkins**: (*Also, Atkins*) is a citizen of United States, and is a resident of the State of Illinois.

D. **Tommie Bosley**: (*Also, Bosley*) is a citizen of United States, and is a resident of the State of Illinois.

E. **Henry Ribich**: (*Also, Ribich*) is a citizen of the United States, and is a resident of the State of Illinois.

F. **Ruben Castillo**: (*Also, Castillo*) is a citizen of the United States, and is a resident of the State of Illinois.

G. **Leroy K. Martin**: (*Also, Martin*) is a citizen of the United States, and is a resident of the State of Illinois.

H. **Robert More**: (*Also, More*) is a citizen of the United States, and is a resident of

the State of Illinois.

J. **Anna M. Loftus**: (*Also, Loftus*) is a citizen of the United States, and is a resident of the State of Illinois.

K. **Michael A. Eurich**: (*Also, Ribich*) is a citizen of the United States, and is a resident of the State of Illinois.

L. **Villa Capital Properties**: (*Also, VCP*) is a corporation of the United States, and is during business in the State of Illinois.

M. **Elizabeth Lyons**: (*Also, Ribich*), is a citizen of the United States, and is a resident of the State of Illinois.

N. **Michael Francis Otto**: (*Also, Otto*) is a citizen of the United States, and is a resident of the State of Illinois.

O. **Raymond W. Mitchell**: (*Also, Mitchell*) is a citizen of the United States, and is a resident of the State of Illinois.

P. **Timothy L. Rowell**: (*Also, Rowell*) is a citizen of the United States, and is a resident of the State of Illinois.

Q. **John Avgerinos**: (*Also, Avgerinos*) is a citizen of the United States, and is a resident of the State of Indiana.

R. **Paul Avgerinos**: (*Also, Avgerinos*) is a citizen of the United States, and is a resident of the State of Indiana.

S. **Samantha L. Babcock**: (*Also, Babcock*) is a citizen of the United States, and is a resident of the State of Illinois.

T. **Steven E. Anderson**: (*Also, Anderson*) is a citizen of the United States, and is a resident of the State of Illinois.

U. **Erik Hubbard**: (*Also, Hubbard*) is a citizen of the United States, and is a resident of the State of Illinois.

V. **Roderick Pierce**: (*Also, Pierce*) is a citizen of the United States, and is a resident of the State of Illinois.

W. **Urban Partnership Bank**: (*Also, UPB*) is a corporation of the United States, and is during business in the State of Illinois.

X. **Shorebank**: (*Also, Witness Shorebank*) is a corporation of the United States, and is during business in the State of Illinois.

Y. **Chuhak & Tecson, P.C.**: (*Also, C&T*) is a corporation of the United States, and is during business in the State of Illinois.

IV. NOTICED ENTITIES PRUSUANT FEDERAL, STATE AND LOCAL LAWS

68. Below is the list of noticed entities pursuant to Federal Law among others:

- A. U.S. JUSTICE DEPARTMENT (DOJ)
- B. UNITED STATES MARSHALL
- C. FEDERAL BUREAU OF INVESTIGATION (F.B.I.)
- D. ASSISTANT ATTORNEYS GENERAL
- E. AMERICAN CIVIL LIBERTIES UNION (ACLU)

V. CLASS-ACTION (WITH EXCEPTION OF THE RICO COUNT(S))

69. **CLASS MEMBERS** (*whereas applicable*)

(a). **CLASS MEMBERS** are past, present, and future United States of America (USA) citizens who number over one million, live, and/or conduct business (in the past, present, and/or future) in the USA, state of Illinois, County of Cook, and City of Chicago.

(b). **CLASS ONE** - are all past, present, and future *African-American* citizens of the USA and State of Illinois who number more than ten thousand. All are also **CLASS TWO** members.

(c). **CLASS TWO** – are all past, present, and future citizens of the USA and of the State of Illinois who number more than ten thousand. Some are member of **CLASS ONE**.

(d). Plaintiffs are members of both Classes.

(e). The members of the Classes are so numerous that joinder of all members are impractical. There are questions of “*law*” and “*fact(s)*” common to the representative the Plaintiffs.

(f). The questions of “*law*” and “*fact(s)*” common to the class members predominate over any question affecting only claims of individual members.

(g). If individual actions were required to be brought by each class member, a multiplicity of suits would result, and would cause great and undue hardship to the parties and the court(s).

(h). Therefore, a class-action complaint is superior to other available methods for the fair and efficient adjudication of the controversy.

(i). The identity of all the class members are presently unknown to the named Plaintiffs, but can easily be determined from the past and present books and records of in the United States of America, State of Illinois, County of Cook, and City of Chicago; such as state courts’ files; public records; addresses and telephone records; utility records; state, county, and municipal records; census; social security; real estate property records; and unemployment insurance records; but not limited thereto.

(k). There are questions of “*law*” and “*facts*” common to the representative parties and other members of the class and predominate over any question affecting only individual members.

(l). If individual actions were required to be brought by each member of the class, multiplicity of suits would result, causing great and undue hardship to the parties and the court.

(m). Therefore, a class-action is superior to other available methods for the fair and efficient adjudication of the controversy.

VI. SUMMARY AND NATURE OF THIS ACTION:

70. Plaintiffs in this civil action, as alleged-herein, raised/arising, from the illicit scheme by the Defendant(s) to collectively and continuously attacks on Marvin Faulkner and Samuel C. Umunna for their aggressive filing of complaints and law suits against the illicit behavior and activities of banks, judges, law firms, attorneys and individuals who illegally wrong Marvin Faulkner, Samuel C. Umunna and others connected with Faulkner and Umunna; that, the defendant(s) under color of law are at issue with the followings:

(a). The Defendant(s) has/have great power and authority over/than Marvin Faulkner and Samuel C. Umunna, the Plaintiffs. And, that the defendant(s) is/are illicitly, under color of law, using their power and authority to harm Marvin Faulkner and Samuel C. Umunna; as set forth therein.

(b). The Defendant(s) has/have great power and authority over/than the Marvin Faulkner and Samuel C. Umunna and are continuously their power/authority to harm Marvin Faulkner and Samuel C. Umunna with intimidation, detainment, emotional distress, depletion of Plaintiffs’ funds, vexatious litigations; but, not limited to the above.

71. Plaintiffs will and/or have continued to legally fight back against the Defendant(s) to protect their Constitutionals', States' and Locals' Rights' against the banks, judges, law firms, attorney and individuals in protection of their personal, as well as, their properties from the illicit and *influential behavior* from and by the Defendant(s): ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL FRANCIS OTTO; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY

SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; STEVEN E. ANDERSON; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD and RODERICK PIERCE.

72. Plaintiff(s); realized, since 2008 to present of this "*Amended Verified Complaint*", that some judges took offense to Marvin Faulkner's and Samuel C. Umunna's for their aggressive and victorious legal litigation, against the banks, law firms and attorneys.

73. The Plaintiff(s) filing their complaints and law suits against the Defendant(s); aforementioned, as a result, Marvin Faulkner and Samuel C. Umunna have received backlash by the Defendant(s). Herein are counts and causes of actions; but, not limited to, the followings counts and causes of actions by the plaintiffs of Federal Common Law and under Racketeer Influenced and Corrupt Organizations Act ("RICO") 18 U.S.C. §1961 *et seq.*, that is, to conduct and participate in the conduct of the affairs of the enterprise through a pattern of racketeering activity involving multiple acts indictable under Federal Common Law(s) *i.e.* (mail fraud, money laundering, extortion, obstruction of justice) and under Federal and State law (bribery and bribery-related official misconduct) in count(s): **(1). Rico; (2). 42 U.S.C. §1983; (3). 18 U.S.C. §242; (4). Hate Crime; (5). §1981- Civil Rights Violations; (6). §1985(3) Deprivation; (7). Intentional Tort; (8). Intimidation; (9). Pierced Corporate Veil; (10). Unjust Enrichment; (11). §1986-Conspiracy; (12). Emotional Distress** and related claims arising from this matter at bar; but not, limited to the aforementioned claims by the plaintiff(s), by such actions plaintiffs, Faulkner and Umunna are seeking damages in each count(s) against the Defendant(s).

74. Plaintiff(s) are alleging that the Defendant(s) together or for the purpose of the

defendants' illicit enterprise; including, certain not yet named Defendants *i.e.* Banks, judges, agents, co-conspirators, and aiders and abettors, engaged and are engaging in state common law fraud; federal statutes and state statutory criminal fraud, thereby and herein damaged Plaintiff Faulkner and Plaintiff Umunna.

75. Plaintiffs are furthermore are alleging that the Defendant(s) conspired to cover-up fraudulent acts of themselves and aiders and abettors to committed additional crimes in the furtherance of their conspiracy; including, obstruction of justice and racketeering.

Plaintiffs' question is to this Honorable Court. Is it permissible for Defendant(s):

ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC.; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL FRANCIS OTTO; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN

MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; STEVEN E. ANDERSON; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE to violate one or more of the twelve counts listed in this "*Amended Verified Complaint*"?

76. Plaintiffs requests that this Honorable Court rule in favor of Plaintiffs, Marvin Faulkner and Samuel C. Umunna, and rule against each Defendant(s) for actual damages:

- a). 2950 West Monroe of Chicago, Illinois (*valued*: \$192,384.68);
- b). 2954 West Monroe of Chicago, Illinois (*valued*: \$187,081.97);
- c). 13239 South Baltimore of Chicago, Illinois (*valued*: \$111,037.81);
- d). 11332 South Calumet of Chicago, Illinois (*valued*: \$149,613.50);
- e). 12822 South Emerald Ave. of Chicago, Illinois (*valued*: \$149,868.81);
- f). 828 N. Ridgeland Ave. Oak Park, Illinois (*valued*: \$880,955.50);
- g). 10141 South Crandon Ave. of Chicago, Illinois (*valued*: \$135,495.33);
- h). 7739 South King Drive of Chicago, Illinois (*valued*: \$89,380.29);
- i). 10736 South Vernon Ave. of Chicago, Illinois (*valued*: \$173,054.43);
- j). 2946 West Monroe of Chicago, Illinois (*valued*: \$151,839.72);
- k). 8206 South Honore of Chicago, Illinois (*valued*: \$141,729.37);
- l). 1140 South Keeler of Chicago, Illinois (*valued*: \$266,925.10);
- m). 1104-06 West 78th Street of Chicago, Illinois (*valued*: \$264,973.23);

- n). 1437 West Howard of Chicago, Illinois (*valued*: \$927,996.43);
- o). 10024 S. Morgan of Chicago, Illinois (*valued*: \$117,897.43);
- p). 120 East 45th Street Unit #202 of Chicago, Illinois (*valued*: \$166,375.81);
- q). 129 North Pine Ave. Unit B of Chicago, Illinois 60624 (*valued*: \$250,284.70);
- r). 10739 South Cottage Grove Ave., Chicago, Illinois (*valued*: \$73,547.06);
- s). 4824 West Monroe of Chicago, Illinois (*valued*: \$195,250.00);
- t). 2012 West 69th Place of Chicago Illinois (*valued*: \$165,000.00);
- u). 2015 West 69th Place of Chicago Illinois (*valued*: \$115,080.70) and
- v). (*Hereinafter the properties will also be known as "The Properties" or "Properties of Umunna and Faulkner"*).

77. Plaintiffs are requesting in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in *actual damages*. (**TO BE DETERMINED**) in *compensatory damages*. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in *treble damages* and Forty Million Dollars (**\$40,000,000.00**) in *punitive damages*; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

VII. RELEVANT FACTS, UPON WHICH RELIEF IS BEING SOUGHT:

[By The Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

78. William Farrow is (owner/president) of failed ShoreBank. William Farrow is a

creator of Urban Partnership Bank (UPB) and in or around August of 2010 under/or with the direction of William Farrow, ShoreBank filed for chapter 11 bankruptcy protection; within, 20 days of ShoreBanks' chapter 11 bankruptcy, William Farrow and Federal Deposit Insurance Corporation (FDIC receiver of ShoreBanks' assets) and others are in violation of §1962(c); as set forth in whole, herein, that commenced from a *behind closed doors deals*, with *unclean hands*, in a short bidding process which only allowed UPB to bid on the liquidation of Bankrupted ShoreBank assets, a Community-Development bank in Chicago, Cleveland and Detroit. The FDIC subsequently **sold** ShoreBanks' assets to UPB -William Farrow, the ShoreBank president and creator of the new institution called *Urban Partnership Bank*. This move was *unusual* for the *FDIC*, which usually bars investors who own more than 10% of the failed bank from bidding on its assets.

79. On August 20, 2010, William Farrow, entered into an agreement with the FDIC through Urban Partnership Bank, titled: "PURCHASE AND ASSUMPTION AGREEMENT WHOLE BANK ALL DEPOSITS AMONG FEDERAL DEPOSIT INSURANCE CORPORATION, RECEIVER OF SHOREBANK, CHICAGO, ILLINOIS FEDERAL DEPOSIT INSURANCE CORPORATION and URBAN PARTNERSHIP BANK, CHICAGO, ILLINOIS DATED AS OF AUGUST 20, 2010" (Also, herein, known as the "August 20, 2010 Agreement"). William Farrow and Urban Partnership Bank were assured of no outside bidder of the assets of ShoreBank by the FDIC.

80. Federal Deposit Insurance Corporation on August 20, 2010 knowingly entered into a Purchase and Assumption Agreement titled: ("WHOLE BANK ALL DEPOSITS among FEDERAL DEPOSIT INSURANCE CORPORATION, RECEIVER OF

SHOREBANK, CHICAGO, ILLINOIS FEDERAL DEPOSIT INSURANCE CORPORATION and URBAN PARTNERSHIP BANK, CHICAGO, ILLINOIS DATED AS OF AUGUST 20, 2010”) with William Farrow, ShoreBank president and creator of Urban Partnership Bank with unclean hands.

81. The FDIC received in access of \$8.5 million to settle a claim from its receivership of Shorebank and to distribute Shorebank’s remaining assets to other creditors, believed to be UPB.

a). William Farrow was instrumental in assuring payment in access of \$8.5 million to the FDIC to settle a claim from its receivership of Shorebank and to distribute Shorebank’s remaining assets. The FDIC was well aware that William Farrow had strong connection with ShoreBank, with more than 10% of failed bank in bidding on its assets.

82. The Federal Deposit Insurance Corporation filed a Federal Complaint, case number 13-cv-05888 against named defendants; therein,: Drexel Amy; Olga v. Lakes-Battle; James Bringley, Eric Rader and Thurman Smith, five officers of ShoreBank in case number 13-cv-05888 In The United States District Court For The Northern District Of Illinois, Eastern Division, pursuant to 12 U.S.C. §1821 authority granted to the FDIC.

83. The Federal Deposit Insurance Corporation claimed and seek to recover more than \$73 million, that, the five former ShoreBank’s officers acted negligently and grossly negligently and breached their fiduciary duties by disregarding the Bank’s loan policy, underwriting guidelines and prudent lending practices during loans approved between December of 2005 and June of 2009 acted and omissions that given rise to the

Defendants' liability include, but are not limited to the followings:

- (i). failing to obtain borrower and guarantor financial information;
- (ii). Relying on outdated, unverified, and inadequate financial information for borrowers and guarantors;
- (iii). Failing to perform and/or ensure that global cash flow analyses were performed prior to loan approval;
- (iv). Failing to properly assess the repayment ability of borrowers and/or guarantors;
- (v). failing to ensure that loans were secured by sufficient collateral;
- (vi). extending credit in excess of permitted loan-to-value ("LTV") ratio limits;
- (vii). Approval of loans in excess of individual approval authority and without proper committee approval;
- (ix). approving loans without adequate documentation;
- (x). permitting debt service coverage ratios ("DSCR") below minimum requirements.

84. Pursuant to *12 U.S.C. §1821* the FDIC was granted authority as Receiver (as Receiver for the bank by the Illinois Department of Financial and Professional Regulation – Division of Banking ("IDFPR") on August 20, 2010. Pursuant to *12 U.S.C. §1821(d)(2)(A)(i)*, the FDIC succeeded to all rights, titles, powers, and privileges of the Bank and the Bank's shareholders, account-holders, and depositors. *FDIC* without restriction though "Limited Power of Attorney" gave *UPB* full authority to execute on behalf of the *FDIC* under applicable resolutions of the FDIC's board of directors and re-delegation, therein. *FDIC*; as well as error against Samuel C. Umunna and Marvin Faulkner properties:

- a). *FDIC failed* to protect plaintiff's Umunna's rights and *FDIC* should have

restricted *UPB* authority of *ShoreBanks'* assets from the *unclean hands* of the mortgages obtained by *ShoreBank* that caused harm to Samuel C. Umunna and Marvin Faulkner.

b). *FDIC* failed to secure/protect Samuel C. Umunna's and Marvin Faulkner's interest in the properties within *ShoreBanks'* filed Chapter 11 Bankruptcy.

c). *FDIC failed* to oversee UPB in modifying of Samuel C. Umunna's and Marvin Faulkner's properties pursuant the "*August 20, 2010 Agreement*".

d). *FDIC failed* to ensure a fair execution of the August 20, 2010 Agreement between FDIC receiver of *ShoreBank* assets and UPB.

e). *FDIC* was aware that *ShoreBank* officers engaged in predatory lending and unfair lending practices; including, reverse redlining and did not correct *ShoreBank's* illicit and illegal lending practices against Samuel C. Umunna and Marvin Faulkner interest and their properties.

85. Urban Partnership Bank (*UPB*) abused the authority under color of law by filing Commercial Foreclosure Complaints on Non-Commercial Properties of Samuel C.

Umunna's and Marvin Faulkner. UPB alleged under *the August 20, 2010 Agreement and Chancery Court's Filing to Defraud Marvin Faulkner and Samuel C. Umunna*.

UPB claimed with the authority given by *FDIC and/or claiming that* the FDIC at design

to defraud, refused to guarantee or warranty in the "August 20, 2010 Agreement" in

disguise performance of Promissory Note by its "ENDORSEMENT AND ALLONGE

TO PROMISSORY NOTE" in which, were without warranty allowed UPB to perform

the illicit commercial foreclosures on non-commercial properties with were added by

defendants: ANNA M. LOFTUS; PIERCE & ASSOCIATES; JENNER & BLOCK LLP;

CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL

PROPERTIES; ELIZABETH LYONS; DARRLY B. SIMKO; ALFRED M. SWANSON

JR.; MICHAEL FRANCIS OTTO; MEREDITH FREEMAN; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SAMANTHA L. BABCOCK; STEVEN E. ANDERSON and ERIK HUBBARD conspirators in a commercial foreclosures on non-commercial properties.

86. "ENDORSEMENT AND ALLONGE TO PROMISSORY NOTE is an agreement between *FDIC* and *UPB* which states in part: "Pay to the order of Urban Partnership Bank, an Illinois banking corporation, as assignee of the Federal Deposit Insurance Corporation, as Receiver for ShoreBank, without warranty, representation or recourse of any kind, that certain note (Date of Note, at discovery) in the original principal amount (amount, at discovery) executed by Samuel Umunna. The FDIC hereby endorses and assigns the Note to Lender. This assignment is made without recourse, representation or warranty, express or implied, by the FDIC in its corporate capacity or as Receiver. All references in the Note to "Lender" shall mean and include Urban Partnership Bank" (*In pertinent parts*).

87. An "ENDORSEMENT AND ALLONGE TO PROMISSORY NOTE", *dated in the year 2012*, were designed to protect themselves from Urban Partnership Bank acknowledges of Shore Bank's unclean mortgages as the FDIC noted later in case number: 13-cv-05888 IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION. And, pursuant to 12 U.S.C §1821(d)(2)(A)(i), the FDIC succeeded to all rights, titles, powers, and privileges of ShoreBank's and the ShoreBank's shareholders, account-holder, and depositors. FDIC without restriction though "Limited Power of Attorney" gave Urban Partnership Bank, full authority to execute on behalf of the FDIC under applicable resolutions of the

FDIC's board of directors and re-delegation, therein.

88. That; the FDIC failed to protect the rights of Samuel C. Umunna; under the Mortgage and Note Agreement with ShoreBank. [As well as, Marvin Faulkner, partner of Samuel C. Umunna, was greatly harmed through the FDIC and William Farrow's, ShoreBank and Urban Partnership Bank illicit back-door and hidden deal, as fore mentioned]. FDIC should have restricted with supervision the authority they gave to UPB of the unclean Mortgages of ShoreBank pursuant the "ENDORSEMENT AND ALLONGE TO PROMISSORY NOTE".

89. The Plaintiffs, Umunna and Faulkner, labels the below properties that UPB and their conspirators, in their illicit commercial foreclosure scheme, *to defraud Marvin Faulkner and Samuel C. Umunna of their properties:*

- 1). 1104-06 West 78th St., Chicago, Illinois 60620 under case #: 2012-CH-44556;
- 2). 1140 South Keeler, Chicago, Illinois 60624 under case #: 2012-CH-38031;
- 3). 2946 West Monroe Street, Chicago, Illinois 60612 under case #: 2012-CH-37391;
- 4). 2950 West Monroe Street, Chicago, Illinois 60612 under case #: 2012-CH-38239;
- 5). 2954 West Monroe Street, St., Chicago, Ill. 60612 under case #: 2012-CH-37389;
- 6). 7739 South King Drive Ave., Chicago, Illinois under case #: 2012-CH-38596;
- 7). 8206 South Honore Street, Chicago, Illinois 60620 under case #: 2012-CH-38034;
- 8). 10024 South Morgan Street, Chicago, Illinois 60643 under case #:2012-CH-38033;
- 9). 10141 South Crandon Ave., Chicago, Illinois 60617 under case #:2012-CH-36572;
- 10). 10736 South Vernon Ave., Chicago, Illinois 60628 under case #: 2012-CH-38032;
- 11). 10739 South Cottage Grove Ave., Chicago, Il. 60628 under case #: 2012-CH-28852;
- 12). 11332 South Calumet Street, Chicago, Illinois 60628 under case #: 2014-CH-01156;

13). 12822 South Emerald Ave., Chicago, Illinois 60628 under case #: 2012-CH- 40727;

14). 13237-39 So. Baltimore St., Chicago, Ill. 60632 under case #:2012-CH-38240 *and*

15). 1437 West Howard Street, Chicago, Illinois 60626 under case #: 2012-CH-38498.

90. Plaintiffs are claiming [*and will show by/through allowance of discovery by this court*] that William Farrow owner and/or connected with Urban Partnership Bank conspired to benefits with FDIC in a closed transaction and transferred of ShoreBanks' assets to Urban Partnership Bank and to pay/paid the FDIC in access of \$8.5 million.

(a). William Farrow owner and/or connected with Urban Partnership Bank conspired to benefits with FDIC in a closed transaction and transferred of ShoreBanks' bankruptcy to transfer ShoreBanks' assets to Urban Partnership Bank and to pay/paid the FDIC in access of \$8.5 million for ill-gotten gain, as aforementioned; through, an illicit backdoor deal.

(b). William Farrow; ShoreBank; Urban Partnership Bank and the Federal Deposit Insurance Corporation had/have control either directly and/or indirectly of the Plaintiffs, Samuel C. Umunna's and Marvin Faulkner's, properties, known as "*Properties of the August 20, 2010 Agreement and Chancery Court's Filing to Defraud Marvin Faulkner and Samuel C. Umunna*" were wronged by the Defendant(s)' conspiracy of the properties listed below purpose is/were to wrong the Plaintiffs and take/control of ill-gotten gain of the Plaintiffs', Samuel C. Umunna and Marvin Faulkner's properties:

1). 1104-06 West 78th St., Chicago, Illinois 60620 under case #: 2012-CH-44556;

2). 1140 South Keeler, Chicago, Illinois 60624 under case #: 2012-CH-38031;

3). 2946 West Monroe Street, Chicago, Illinois 60612 under case #: 2012-CH-37391;

4). 2950 West Monroe Street, Chicago, Illinois 60612 under case #: 2012-CH-38239;

- 5). 2954 West Monroe Street, Chicago, Illinois 60612 under case #:2012-CH-37389;
- 6). 7739 South King Drive Ave., Chicago, Illinois under case #: 2012-CH-38596;
- 7). 8206 South Honore Street, Chicago, Illinois 60620 under case #: 2012-CH-38034;
- 8). 10024 South Morgan Street, Chicago, Illinois 60643 under case #: 2012-CH-38033;
- 9). 10141 South Crandon Ave., Chicago, Illinois 60617 under case #: 2012-CH-36572;
- 10). 10736 South Vernon Ave., Chicago, Illinois 60628 under case #: 2012-CH-38032;
- 11). 10739 South Cottage Grove Ave., Chicago, Il. 60628 under case #: 2012-CH-28852;
- 12). 11332 South Calumet Street, Chicago, Illinois 60628 under case #: 2014-CH-01156;
- 13). 12822 South Emerald Ave., Chicago, Illinois 60628 under case #: 2012-CH- 40727;
- 14). 13237-39 So. Baltimore St., Chicago, Ill. 60632 under case #: 2012-CH-38240 and
- 15). 1437 West Howard Street, Chicago, Illinois 60626 under case #: 2012-CH-38498.

91. When the *“Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna”* commenced it deepen the cover up and protection of the actors of conspirators and their commitment to illicit activities had accelerated. The conspirators *i.e.* Defendant(s), commitment to cover up, divert, frustrate, shunt, mislead, ignore germane factual legal arguments and factual evidence had damaged Marvin Faulkner and Samuel C. Umunna who fought for and is fighting for justice on legal matters only to be confronted continually with the defendant(s) disdain of the laws of our great land of the United States of America.

92. That the *“Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna”* are not commercial properties.

93. That the properties known as *“Properties of the August 20, 2010 Agreement and*

Chancery Court's Filing to Defraud Marvin Faulkner and Samuel C. Umunna" are not commercial properties and should not have been filed under a commercial foreclosures.

a). *That:* Chuhak & Tecson P.C.; Samantha L. Babcock; Michael A. Eurich; Steven E. Anderson; Villa-Capital Properties and Erik Hubbard with Anna M. Loftus; Elizabeth Lyons; Michael Francis Otto; Darrly B. Simko; Alfred M. Swanson Jr.; Pamela Mclean Meyerson and with others refused to address Plaintiffs' Declaratory motions that the "*Properties of the August 20, 2010 Agreement and Chancery Court's Filing to Defraud Marvin Faulkner and Samuel C. Umunna*" are or are not commercial properties.

b). *That:* Chuhak & Tecson P.C.; Samantha L. Babcock; Michael A. Eurich; Steven E. Anderson; Villa-Capital Properties and Erik Hubbard with Anna M. Loftus; Elizabeth Lyons; Michael Francis Otto; Darrly B. Simko; Alfred M. Swanson Jr.; Pamela Mclean Meyerson and with others cover up, ignored and promoted that Judges not to address the germane issue of the properties, herein, known as the "*Properties of the August 20, 2010 Agreement and Chancery Court's Filing to Defraud Marvin Faulkner and Samuel C. Umunna*" are or are not commercial properties.

c). That, due to the conspiracy *that:* Chuhak & Tecson P.C.; Samantha L. Babcock; Michael A. Eurich; Steven E. Anderson; Villa-Capital Properties and Erik Hubbard with Anna M. Loftus; Elizabeth Lyons; Michael Francis Otto; Darrly B. Simko; Alfred M. Swanson Jr.; Pamela Mclean Meyerson and with others herein, have against the Plaintiff(s); the State Court judges, herein-Defendant(s), refused to address Plaintiffs' Declaratory motion by Marvin Faulkner and Samuel C. Umunna in State Court of the "*Properties of the August 20, 2010 Agreement and Chancery Court's Filing to Defraud*

Marvin Faulkner and Samuel C. Umunna” are or are not commercial properties.

94. Urban Partnership Bank and William Farrow conspired and instrumental use of the co-conspirators, Chuhak & Tecson P.C.; Samantha L. Babcock; Michael A. Eurich; Steven E. Anderson Villa-Capital Properties and Erik Hubbard with Anna M. Loftus; Elizabeth Lyons; Michael Francis Otto; Darryl B. Simko; Alfred M. Swanson Jr.; Pamela Mclean Meyerson with others, herein noted, hereinafter, to focus on the “*Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*”.

a). Urban Partnership Bank and William Farrow conspired and instrumentally in the use of *co-conspirators*, Chuhak & Tecson P.C.; Samantha L. Babcock; Michael A. Eurich; Steven E. Anderson; Villa-Capital Properties and Erik Hubbard with Anna M. Loftus; Elizabeth Lyons; Michael Francis Otto; Darryl B. Simko; Alfred M. Swanson Jr.; Pamela Mclean Meyerson and with others, herein noted, hereinafter, to focus on the “*Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*” to increase *ill-gotten gain* in their conspiracy scheme to defraud the Plaintiffs.

b). Urban Partnership Bank and William Farrow conspired and were instrumental in the use of co-conspirators, Chuhak & Tecson P.C.; Samantha L. Babcock; Michael A. Eurich; Steven E. Anderson; Villa-Capital Properties and Erik Hubbard with Anna M. Loftus; Elizabeth Lyons; Michael Francis Otto; Darryl B. Simko; Alfred M. Swanson Jr.; Pamela Mclean Meyerson with others, herein noted, hereinafter, to focus on the “*Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*” knowingly of ShoreBank unclean

hands, mortgage deals of the “*Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*”.

95. Plaintiffs, herein, retain, *at this time*, the names and statements of the witnesses against the Defendant(s) who are: Employees of Cook County Clerk; Court Reporter(s); Bankers; Judges and Individuals (Hereinafter, known as “Whistleblowers”). For reasons of the “Whistleblowers” protection and from retaliation from the Defendant(s), herein, and the friends of Defendants at this time the Plaintiff(s) will reveal the names of the “Whistleblowers” in the procession of this matter.

96. William Farrow; ShoreBank; Urban Partnership Bank and the Federal Deposit Insurance Corporation *ill-gotten gain* of Plaintiff(s)’ properties known as: *Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*” were legally wrong.

97. During the issues within the “*Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*”; Marvin Faulkner and Samuel C. Umunna, scrutiny, the Plaintiffs found corruption deeper than imagined and the cover up to defraud not only Marvin Faulkner and Samuel C. Umunna; but a money laundering schemes by the defendants. And, because of the plaintiffs uncovering of the laundering schemes Faulkner and Umunna were target to be harmed.

98. Plaintiff(s)’, Faulkner and Umunna, aggressively filed complaints against law firms, attorneys, banks, individuals and at the Plaintiffs’ dismay particular judges of the Circuit Court of Cook County of the City of Chicago Illinois and placed the Plaintiff(s) on a “Hit List”.

99. The Plaintiff(s) have made the public aware of the corruption in our judicial

system through particular individuals, herein, this "*Amended Verified Complaint*" the Plaintiff(s) layout the Defendant(s) and their *ill-gotten gain* and continual attempts to stop Marvin Faulkner and Samuel C. Umunna from uncovering the corruption of the Defendant(s) and others as detailed, hereinafter.

a). Marvin Faulkner's and Samuel C. Umunna's aggressive filing of complaints and law suits against banks, law firms, attorneys, judges and individuals in connection with illegally wrong to Marvin Faulkner and Samuel C. Umunna and placed Marvin Faulkner and Samuel C. Umunna on a "*Hit List*" by the Defendant(s) and others to keep their corruption hidden.

b). The Defendant(s) have *great influence/power* and are able to continue to harm Marvin Faulkner and Samuel C. Umunna. Nevertheless; at Plaintiff(s) last breath, for justice, the Plaintiffs will continue to legally *litigate/fight* back against the Defendant(s). But, the Plaintiff(s) to protect their Constitutionals and States Rights', according to the law of the land, against the Defendant(s) and others conspirators of corruption.

c). In addition; hereinafter, within the Plaintiffs' exposition of the occurrences from the year of 2008 until this "*Amended Verified Complaint*" of the corruption by the defendant(s) and others conspirators in their corruption to harm and damage placing Marvin Faulkner and Samuel C. Umunna on a "*Hit List*" for the revealing the Defendant(s) elaborate laundering scheme; due, to the aggressive litigation of the Plaintiff(s) Marvin Faulkner and Samuel C. Umunna:

VIII. IN THE YEAR OF 2008 OF THE WRONG AGAINST THE PLAINTIFFS

[Marvin Faulkner and/or Samuel C. Umunna filed formal complained against judges, banks, law firms, attorneys & individuals. Plaintiff(s) understand that:]

100. In May of 2008; Faulkner learned during a conversation with his tenant Crystal Ross at the address of 2012 West 69th Place First Floor Apartment, Chicago Illinois, 60636 (Renting at \$700.00 per month to owner and landlord therein, Marvin Faulkner). then she told Faulkner and wrote an her affidavit stating that; a representative, who identified himself as a representative of Wells Fargo Bank, N. A. on several occasions, beginning in May of 2008, the representative from Wells Fargo Bank, N.A. have come to her resident to inform her that Marvin Faulkner was no longer the owner of the property at 2012 west 69th Place, and that immediately to stop any and all payments of rent and any other forms of payment to Marvin Faulkner. Also the representative stated that Wells Fargo Bank, N.A. is the new owner and that Wells Fargo Bank will give Crystal Ross \$1,000.00 if she move from 2012 West 69th Place First Floor Apartment of Chicago Illinois. This is what Marvin Faulkner learned from tenant Crystal Ross then Faulkner immediately addressed the false claim that Wells Fargo Bank stated to Crystal Ross, Faulkner's tenant. The tenant, Crystal Ross, due to Wells Fargo Bank's statements to Crystal Ross; Crystal Ross stopped paying rents to Marvin Faulkner as of June of 2008.

101. In May of 2008, according to the affidavit of Marvin Faulkner's tenant, Lillie Miller (Miller), who lived at 2012 West 69th Place, Second Floor Apartment, Chicago, Illinois 60636; (Renting at \$800.00 per month to owner and landlord therein, Marvin Faulkner). stated, that people from the mortgage company, started coming around her home at 2012 West 69th Place, Chicago, Illinois and were taken pictures of the house and others people actually came and spoke with Lillie Miller, telling Lillie Miller that Marvin Faulkner's property had been foreclosed. That Marvin Faulkner does not own 2012 West 69th Place, Chicago Illinois 60636. (Renting at \$1,200.00 per month to owner and

landlord therein, Marvin Faulkner). Lillie Miller called Faulkner and told Faulkner about the people from the mortgage company. Faulkner then told Miller that he is the owner of said property and that the bank was just trying to make the tenants stop paying rents; so that the landlords could fall further behind in their mortgages and then have a more difficult to pay the mortgage and eventually lose the property. The bank continued to come and tell Miller that Faulkner did not own 2012 West 69th Place, and that Wells Fargo Bank was the owners, so Miller stopped paying rents to Marvin Faulkner. Miller sided with Wells Fargo Bank, thinking that Faulkner was trying to trick her into paying him rent. Miller told Faulkner to stop playing games; that the bank is the owners and not Faulkner of 2012 West 69th Place, Chicago, Illinois.

102. On September 03, 2008, Marvin Faulkner gave to Miller a "Five Day Notice". On November 17, 2008 at 9:30 Millers were summoned to court for eviction under case number 2008-M1-728630. A ruling was entered in favor of Marvin Faulkner and against the Miller's, who were no longer in possession of 2012 West 69th Place by December 05, 2008. Faulkner regained possession of 2012 West 69th Place of Chicago, Illinois 60636 as of February 18, 2016 and onwards.

103. Faulkner addressed Wells Fargo Bank's false statements against Faulkner to and warned Wells Fargo Bank that the courts will hear of their malice practices. However, The banks; including, Wells Fargo continued in their malice practice. Eventual, with no help from the courts Faulkner prevailed and received full ownership of the property known as 2012 West 69th Place, Chicago, Illinois; but, Faulkner was extremely damaged of the malicious acts of Wells Fargo Bank's and their agents false statements to Faulkner's tenants.

104. During, January of 2008, Tomeka Henry CHAC tenant of Marvin Faulkner at 2015 West 69th Place, house, of Chicago Illinois 60636. (Renting at \$1,200.00 per month to owner and landlord therein, Marvin Faulkner). [CHAC paid the majority of Tomeka Henry rent]. Tomeka Henry stated that people/representative from Fremont Investment Bank have on many occasions come to Henry home stating in January of 2008 and again around May of 2008 that Fremont Investment told Miss Henry that this property should be vacated and no one should be collecting rents on this property.

105. In August a different man from Fremont Investment came and told Miss Henry that they are the new owners of 2015 West 69th Place and to stop all payments to Marvin Faulkner and that the bank may offer Miss Henry money around One Thousand Dollars (\$1,000.00) to move out.

106. Miss Henry stated to Faulkner that: "I wanted to live in this big house because my family is big. And I told Marvin Faulkner that I really like this house and would like to stay here for at least 10 years; Mainly, because, I hate moving. I've lived at my lasted residency for over 10 years. But, I do not know if Marvin Faulkner even owes this house or not." On January of 2009 Tomeka Henry moved out of 2015 West 69th Place of Chicago Illinois owing rent back rents of over \$10,000.00 dollars from the malicious acts of Fremont Investment Bank, Marvin Faulkner was extremely damaged.

107. During 2008 was the start of Faulkner's experience of the issues at Chancery Court and upon motion to the Chancery Court by Faulkner, Faulkner made aware to the Court of the banks malicious practices and some judges were uncomfortable to take action of Faulkner's making the court aware of the malicious practices against Faulkner from the banks.

a). Faulkner; therefore, took action in eviction court and that is when Faulkner learned that Pierce & Associates, U.S. Bank and Wells Fargo Bank were illicit in their practice in telling Faulkner's tenants to stop paying rents without a Judgment to Foreclosure on Faulkner's property or an Order of Possession of the property by the courts.

b). That the harm perpetrated against Faulkner by Pierce & Associates, U.S. Bank and Wells Fargo Bank were illicit in their practice in telling Faulkner's tenants to stop paying rents to Faulkner without a judgment of Foreclosure and Possession of the property by the court.

c). By the banks, illicit acts, stopping the tenants from paying rents to Faulkner had almost influenced Marvin Faulkner to quick/give up any and all legal battles and abandon all of his the properties.

108. The property known as 7127 South Green Street, Chicago, Illinois where the tenant of Faulkner's, LaVonte Anthony Stewart, lived since March 1, 2006 to January 2009. LaVonte Anthony Stewart paid his rent each monthly up until June of 2008. On June of 2008 LaVonte Anthony Stewart stopped paying his rent. Mr. Stewart told Faulkner that he will no longer pay rent because a person from Pierce & Associates came to Mr. Stewart home at 7127 South Green Street, Chicago, Illinois on or about June 1, 2008 and told Stewart that U.S. Bank National Association is now the owner of 7172 South Green Street and not to pay any more rents to the collector of the rents at 7127 South Green Street. Therefore, Stewart stopped paying rents to Marvin Faulkner and Winifred Ihejirika.

109. Again, in late July of 2008, a different man (second man) from Pierce &

Associates came to Mr. Stewart home at 7127 South Green Street and told Mr. Stewart the very same thing that the first man had told Mr. Stewart from Pierce & Associates. The second man offered \$1,000.00 to Stewart if he would move and have the house broom swept. Due to Faulkner's dismay of the banks malice practices of stopping money/rents by the tenants on many of Faulkner's properties, Faulkner became behind on his mortgages payments and became very discourage that the banks who make false claims against Faulkner and his properties. For a period of time, Faulkner stopped trying to collect rents from Mr. Stewart and other tenants who stopped paying rents to Faulkner based on the false and malevolent claims by the banks, to Marvin Faulkner's tenants.

110. Faulkner's investigation Faulkner became personally involved with the legal process to find out what had embolden the banks and their associates to have confident in the illicit practice and their trickery against or with their clients of their mortgages.

a). In 2008 Marvin Faulkner and his wife Winifred Ihejirika was forced to modified their home Mortgage at 828 North Ridgeland Ave. Oak Park, Illinois 60302; due, to the malice and illegal practices of the banks stopping rental properties source of income and ploy to defraud by the bank as Faulkner will revealed of the corruption of the banking system, herein.

IX. IN THE YEAR OF 2009 OF THE WRONG AGAINST THE PLAINTIFFS

[By the Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

111. In the year June of 2009; John Avgerinos (Father) and Paul Avgerinos (Son)

[Together the Avgerinos] and Marvin Faulkner entered into a contract at 7342 S. Stony

Island, Chicago Illinois. The contract amount was agreed at \$32,000.00 to finish a project; in which, other contractors left undone. That, due to non-payment on the contract by John Avgerinos and Paul Avgerinos, Marvin Faulkner stopped any and all further work on the project of 7342 South Stony Island of Chicago, Illinois until the Avgerinos' payment was received and current. On several occasions John Avgerinos and Paul Avgerinos asked Faulkner to fund the remaining of the project and get paid after the property is sold. Marvin Faulkner declined John Avgerinos and Paul Avgerinos request; because, the Avgerinos request was not the obligation of Marvin Faulkner's pursuant the project agreement. Faulkner demand payments owed from "The Avgerinos" in order to continue said project.

a). John Avgerinos and Paul Avgerinos repeatedly asked and were unable to convince Faulkner to fund/invest into "the Avgerinos" project at 7342 S. Stony Island of Chicago Illinois. Faulkner awaited the schedule payments by the Avgerinos to continue the Avgerinos project.

b). The Avgerinos continued with their request hoping that Faulkner would change his mind. Faulkner remains not to invest in the Avgerinos project. The Avgerinos and Faulkner were both aware that the project should have been bided at \$65,000.00; but, as a favor and the economy Faulkner agreed to \$32,000.00 and that the Avgerinos would be responsible for all permits and finishing of the project.

c). The Avgerinos as agreed with Faulkner that the Avgerinos would supply the finishing material and produce all necessary permits for the project at 7342 South Stony Island of Chicago, Illinois.

d). The Avgerinos became very irate with Faulkner for not investing in the

Avgerinos project in the year 2009.

112. Although, Faulkner was litigating aggressively litigating on foreclosure complaint and filing motions against foreclosure complaints at: 828 North Ridgeland Ave.; 2012 West 69th Place; 4824 West Monroe Street; 2956 West Monroe Street; 7127 South Green; 2015 West 69th Place; 120 West 45th Street and 7122 South Green Street filing appropriate filings. Faulkner, could not relieve the Avgerinos obligation of the 7342 South Stony Island project.

X. IN THE YEAR OF 2010 OF THE WRONG AGAINST THE PLAINTIFFS

[By The Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

113. On August 20, 2010; William Farrow, entered into an agreement with the FDIC through Urban Partnership Bank, titled: "PURCHASE AND ASSUMPTION AGREEMENT WHOLE BANK ALL DEPOSITS AMONG FEDERAL DEPOSIT INSURANCE CORPORATION, RECEIVER OF SHOREBANK, CHICAGO, ILLINOIS FEDERAL DEPOSIT INSURANCE CORPORATION and URBAN PARTNERSHIP BANK, CHICAGO, ILLINOIS DATED AS OF AUGUST 20, 2010". William Farrow and Urban Partnership Bank was assured to a no outside bidder of the assets of ShoreBank by the FDIC.

114. July 14, 2010 posted in the *TRUST ASSIGNMENT FRAUD LETTER TO SEC* that: "This is a report of suspected fraud involving mortgage-back securities. Certain mortgage-backed trusts have been using forged and fraudulent mortgage assignments in foreclosure actions... and throughout the United States" and that **Series 2007-HE6** is listed, therein. It further stated that "Replacement Assignments" including Assignments

that were prepared with false information regarding dates and signers and (among other illegal acts) it stated that “In many cases, where the Trust has successfully foreclosed, it had no legal right to do so.....(See complete claims against **Series 2007-HE6**) layers and layers of pages. And, Winifred Ihejirika, wife of Marvin Faulkner’s, reported to the court within her affirmative defenses that not only were the signature on the purposed mortgage and note presented by LaSalle Bank in case number 2008-CH-13579 not her. But, that the mortgage she has in case number 2008-ch-13579 is unsecured and therefore the law suit should be a contract issue not a foreclosure issue. The judge presiding [and several other judges] refused to perform an evidential hearing on the matter. Several *Whistleblowers* informed Marvin Faulkner that the illegal taking of people’s properties and court’s corruption to take the peoples properties; and, to favor the banks and law firms at any and all cost. Thereafter Marvin Faulkner became aggressive in litigation and filed many complaints against judges and bank and law firms. Many judges thereafter placed Marvin Faulkner on a “*Hit List*”; aimed to take and destroy Marvin Faulkner and anyone connected with him.

115. September 20, 2010; I, Marvin Faulkner, herein deposed what he witnessed from the behavior, treatment and line of questioning from Judge Darryl B. Simko to Samuel C. Umunna (Marvin Faulkner being the *Lien holder and co-owner* of many of Samuel C. Umunna’s properties). Judge Simko’s attitude and behavior on September 20, 2010 was appalling and as a citizen of the United States, Marvin Faulkner, as other citizens has a duty to assail corruption and any wrong doing against all how promotes wrong doing.

a). That, on September 20, 2010 Samuel C. Umunna presented his motion titled: “Defendant’s Verified Motion to Vacate Order Dated August 03, 2010. This motion was

filed within 30 days pursuant to 735 ILCS 5/2-1301(e).” That, during September 20, 2010 hearing; Judge Darryl B. Simko asked Samuel C. Umunna if he had filed a motion that was dated February 25, 2010 for “Extension of Time to Answer or Otherwise Plead”. Mr. Umunna replied; “Yes”. Thereafter; Judge Simko denied Mr. Umunna’s motion titled: “Defendant’s Verified Motion to Vacate Order Dated August 03, 2010, This Motion was Filed within 30 Days pursuant to 735 ILCS 5/2-1301(e)”; which was an unrelated motion to the February 25, 2010 motion titled: “Extension of Time to File or Otherwise Plead.” Faulkner noticed that Judge Simko pulled the wool over Mr. Umunna’s and used a confusing issue to rule against Prose Samuel C. Umunna.

116. On November 18, 2010; Samuel C. Umunna and Marvin Faulkner came before Judge Simko as Samuel C. Umunna and Marvin Faulkner approached the bench of Judge Simko. Judge Simko yelled at Marvin Faulkner saying “You cannot come before me Mr. Faulkner! Faulkner replied: “Your honor I am a witness and here for moral support.” Judge Simko yelled at Faulkner again and said “Be, be that from the seat, you cannot come up here!” Faulkner immediately went to the seat farthest from Judge Simko, due, to Judge Simko’s anger/dislike he shown towards Faulkner. [Faulkner could only speculate that Judge Simko was not happy with Faulkner; because, Faulkner forced Judge Simko to reverse a void ruling that Judge Simko made against one of Faulkner’s property and in favor of the bank at 2956 West Monroe. That property was taken from Faulkner and put on sale, unknown and noticed to Faulkner. Faulkner; thereafter, motioned to the court, before Judge Simko of Judge Simko’s error, [Either on purpose or by court’s error] on Faulkner’s property; however, Judge Simko did everything in his power [including, purposefully changing Faulkner motions without Faulkner’s

permission/consent] to award Faulkner's property at 2956 West Monroe of Chicago Illinois to the bank. Nevertheless, due to Faulkner's rigorous legal litigation Judge Simko was defeated in his efforts to rule for the bank. Under the void ruling by Judge Simko, Judge Simko reversed his ruling and the property was returned to Faulkner.

117. On June 28, 2010; The Law office of Kovitz, Shifrin and Nesbit forward a letter to Marvin Faulkner via U.S. Mail titled: PRIVILEGED AND CONFIDENTIAL stating he following: RE: CHRISTINA PLACE II CONDOMINIUM ASSOCIATION V. SHAYNA ST. CLAIR, MARVIN AND ALL UNKNOWN OCCUPANTS. SUBJECT PROPERTY: 120 EAST 45TH ST., UNIT 2E, CHICAGO, IL. 60643. "Dear Mr. Faulkner: Please be advised that the above-captioned matter has been re-scheduled for hearing this coming Thursday, July 1, 2010, at 9:30 a.m. in room 1402 of the Richard J. Daley Center. Judge Gomolinski has requested that I provide you with this notice of the forthcoming hearing; Signed by Bryant Gomez." Also, attached with the letter from the Law Office of Kovitz, shifrin and Nesbit to Marvin Faulkner was an unsigned letter stating: "Marvin , Judge Gomolinski has Ruled Against You! It's Over!!! Appearing in the right-hand lower portion of the that letter placed the number 870177.1. Also, the very same number (87017.1) appeared on the signed letter sent by Attorney Bryant Gomez of Kovitz, Shifrin and Nesbit. Faulkner confronted the exparte communication that Judge Gomolinski and Bryant Gomez had in violation of Illinois laws; when Faulkner confronted the issue of the exparte communication on July 1, 2010. Judge Gomolinski and attorney Gomez brushed it off by stating Attorney Gomez was before Judge Gomolinske on a different case not related to case number 2009-M1-718493; and, that due to Judge Gomoliski changing of the date from July 29, 2010 at 11:00 a.m. in

room 1402 for hearing to July 01, 2010, at 9:30 a.m. in room 1402 [27 days earlier than schedule by Faulkner] that Judge Gomolinski did not want Faulkner to miss the new date for that hearing. On that hearing date Judge Gomolinski ruled against Faulkner.

118. During the year of 2010 Faulkner being informed by Whistleblowers and employees of Cook County Circuit Court made Faulkner aware that his aggressive litigation is causing the banks to lose money and cases. Further, Faulkner was warned by Cook County Circuit Court employees, Judges and attorney that Faulkner is revealing issues of corruption that would hinder the banks' [illicit] enterprise. However, Faulkner had and have great faith in the land of the Laws of this great nation; and, that justice would prevail. Nonetheless, Faulkner did notice the judges ignoring germane material issues and making void ruling to litigate from the bench; particularly on Prose litigates cases to favor the banks. Faulkner became more watchful of the judges', lawyers' and law firms' corruptions against the court and against the citizens of our land.

XI. IN THE YEAR OF 2011 OF THE WRONG AGAINST THE PLAINTIFFS

[By The Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

119. In or about 2011; John Avgerinos; Paul Avgerinos; Timothy L. Rowells; Starr, Bejgiert, Zink & Rowells and several circuit court judges and others: Judge Darryl B. Simko; Judge David B. Atkins; Attorney Bryan Gomez of Kovitz, Shifrin & Nesbit Law Office; Christina Place II Condominium Association among a few (together orchestrated a plot directed with others co-conspirators-Defendants, aforementioned and reviled to Faulkner by Timothy L. Rowells and *Whistleblowers*) filed two false complaints:

- a). The first false complaint was a criminal complaint on April of 2010 [Where

Marvin Faulkner was falsely arrested in the court room of Judge Gomolindki by two Chicago Police Detectives. Faulkner was warned of the Judges' orchestrated ploy/framing of Faulkner for his aggressive litigation by attorney Bryant Gomez [Bryant Gomez, who generally and often boasts of him being included and connection with circuit court's judges and the loyalty that they have one for another.]

b). The second false complaint was a civil complaint. On December 21, 2011 case number 2011-L-013743 (*case 2011- L- 013743 is incorporated into this complaint, but not attached, herein*) filed by attorney Timothy L. Rowell presiding before presiding Judge Raymond W. Mitchell how were placed to fulfill the illicit plot to destroy or help destroy Marvin Faulkner.

c). Both of these false complaint were orchestrated by: Judge Darryl B. Simko; Judge David B. Atkins; Attorney Bryan Gomez of Kovitz, Shifrin & Nesbit Law Office; Christina Place II Condominium Association among a few using John Avgerinos and Paul Avgerinos project at 7342 South Stony Island of Chicago, Illinois as a bases to injury and destroy Marvin Faulkner. Marvin Faulkner defeated the first false complaint at trial; the criminal court judge after attorney Josh revealed the multiple lies of John Avgerinos, therein. The second false complaint Faulkner is still in litigation and at issue.

120. On May 14, 2011 Judge Raymond W. Mitchell in relations with Timothy L. Rowell refused to address the default issue against plaintiff John Avgerinos on Marvin Faulkner's Counter-Complaint in case number 2011-L-013743. As the proceeding on May 14, 2011 states: "**Court:** Good morning gentlemen. **Starr.& Rowell:** Good morning your honor. **Faulkner:** Good morning your honor Marvin Faulkner. **Starr & Rowell:** Your honor I would take 28 days to answer Faulkner's Counter Complaint.

Court: O.K 28 days is granted. **Faulkner:** Your honor; for clarification. Are you given the plaintiff 28 days to answer my counter-complaint; in which he is in default? He is over 60 days of the limitation of time to answer the Counter-complaint. **Court:** What do you want me to do? I would give you the same opportunity, if you were in his place. **Faulkner:** There is no motion from the plaintiff; I would like to respond to this issue of why 28 days should not be giving to plaintiff to answer the Counter-Complaint in which he is in default. **Court:** The plaintiff has 28 days to answer counter complaint. This matter is continued to June for statue and we will take it from there. **Starr & Rowell:** Thank you your honor. **Faulkner:** Thank you, your honor.” (WHERE, NO FURTHER PROCEEDING WERE HAD).

121. Faulkner at this point started to realize that his aggressive litigation was taken great affect and forming corrupted individuals to react stronger against Marvin Faulkner. That judges appeared to legislate from the bench with no respect to litigate Marvin Faulkner or to Faulkner’s germane legal issues.

XII. IN THE YEAR OF 2012 OF THE WRONG AGAINST THE PLAINTIFFS

[By The Defendant(s)’ collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

122. In the year of 2012; *Chuhak & Tecson, P.C.*, Law firm for Urban Partnership Bank with their attorneys, agents and judges; including, Anna M. Loftus; Michael A. Eurich; Lizabeth Lyons; Darrly B. Simko; Alfred M. Swanson Jr.; Michael Francis Otto; Edward J. Lesniak; Pamela Mclean Meyerson; Jenner & Block LLP; Villa Capital Properties; Samantha L. Babcock; Steven E. Anderson and Erik Hubbard the participation in UPB’s fraud in misrepresentation to the court of a fraudulent complaint.

Chuhak & Tecson P.C. with Anna M. Loftus; Michael A. Eurich; Lizabeth Lyons; Darryl B. Simko; Alfred M. Swanson Jr.; Michael Francis Otto; Edward J. Lesniak; Pamela Mclean Meyerson; Jenner & Block LLP.; Villa Capital Properties; Samantha L. Babcock; Steven E. Anderson and Erik Hubbard knowingly advanced UPB agenda and plot to defraud Mr. Umunna and Mr. Faulkner by misrepresenting to the court the filing of UPB commercial foreclosure complaints against non-commercial properties. UPB scheme would place Villa Capital Properties as receiver on Samuel C. Umunna's and Marvin Faulkner's residential/non-commercial properties. That, UPB could control and take rents that rightfully belonged to Marvin Faulkner and Samuel C. Umunna of the properties listed below:

- a).** 2950 West Monroe of Chicago, Illinois (*valued:* \$192,384.68);
- b).** 2954 West Monroe of Chicago, Illinois (*valued:* \$187,081.97);
- c).** 13239 South Baltimore of Chicago, Illinois (*valued:* \$111,037.81);
- d).** 11332 South Calumet of Chicago, Illinois (*valued:* \$149,613.50);
- e).** 12822 South Emerald Ave. of Chicago, Illinois (*valued:* \$149,868.81);
- f).** 10141 South Crandon Ave. of Chicago, Illinois (*valued:* \$135,495.33);
- g).** 7739 South King Drive of Chicago, Illinois (*valued:* \$89,380.29);
- h).** 10736 South Vernon Ave. of Chicago, Illinois (*valued:* \$173,054.43);
- i).** 2946 West Monroe of Chicago, Illinois (*valued:* \$151,839.72);
- j).** 8206 South Honore of Chicago, Illinois (*valued:* \$141,729.37);
- k).** 1140 South Keeler of Chicago, Illinois (*valued:* \$266,925.10);
- l).** 1104-06 West 78th Street of Chicago, Illinois (*valued:* \$264,973.23);
- m).** 1437 West Howard of Chicago, Illinois (*valued:* \$927,996.43);

n). 10024 S. Morgan of Chicago, Illinois (*valued*: \$117,897.43) and

o). 10739 South Cottage Grove Ave., Chicago, Illinois (*valued*: \$73,547.06);

All of the above properties are residential/non-commercial properties that UPB orchestrated a plot to foreclose and stealing Umunna's and Faulkner's properties.

123. Year 2012, the intimidation and corruption and the plot against Marvin Faulkner and Samuel C. Umunna increase tremendously. Judge Darryl B. Simko and other circuit court judges, generally cleared the court rooms, to hear Marvin Faulkner's and Samuel C. Umunna's cases, and always noted to Mr. Faulkner that, Faulkner would be held in contempt of court, if Faulkner would ~~bre~~ad wrong, without just reasoning. Judge Simko cleared the court room of visitors and neutral litigants and with the presence of Cook County Sheriffs always standing near Faulkner, Sheriffs' guns sometimes touching Faulkner's back. And, at the rear door of the court room there was always a Cook County Sheriff standing there that no one could enter or leave without the Judge's permission. Faulkner's and Umunna's only protection in the court's proceeding was to hire court reporters on 99% of the court calls, regardless if money permitted, Faulkner have in access of 82 different "Report of Proceedings" with Defendant(s), herein. This provided the only protection from the conspirators, aforementioned, of detainment of Faulkner and Umunna in the matters at bar. This only protection that Faulkner and Umunna had to protect themselves from the Defendants during the years and or times that Faulkner and Umunna were in court with: Anna M. Loftus; Michael A. Eurich; Lizabeth Lyons; Darryl B. Simko; Alfred M. Swanson Jr.; Micheal Francis Otto; Michael N. Varak; Meredith Freeman; Edward J. Lesniak; Pamela Mclean Meyerson; Sonia Pasquesi; Samantha L. Babcock; Steven E. Anderson and Erik Hubbard. (*Faulkner has*

over 40,000 pages in documentations to uncover the conspirators and could and will produce the additional documentations and Transcripts of Report of Proceedings upon request and at importance of the matter at bar. However, more time is required.)

124. Extreme intimidation against Faulkner and Umunna and others and Umunna; including, Judge Michael F. Otto's tactics was by having the Cook County Sheriffs always standing within two feet of nonviolent Marvin Faulkner, during courts proceedings. Faulkner's only protection from Judge Otto's court's proceeding was again to hire Court Reporter, 97% of the time, regardless if money permitted, for the court case calls with Judge Michael F. Otto and Urban Partnership Bank, Faulkner, having in access of 82 different "Report of Proceedings". During one court call Faulkner felt breaching on his neck by the Cook County Sheriff, Faulkner turned and rubbed his shoulder against the chest of one Cook County Sheriff. Faulkner then asked Judge Otto "Is it necessary that the Sheriff be breaching on the back of his neck." Judge Otto laughs and told the Sheriff to take two steps away from Faulkner (*Faulkner has over 40,000 pages in documentations to uncover the conspirators and could and will produce additional documentations and Transcripts of Report of Proceedings upon request and at importance of the matter at bar. However, more time is required*).

125. Michael Eurich, attorney for UPB with full confident, fully self-assured, on many occasions bragged about his strong connections with the judges and the judges dedication to fight for the banks; that, there is no way that the banks will lose in their complaints. Then Michael Eurich said to Marvin Faulkner: "The judges are doing their job and doing quite well. The banks pay very well, to me and to the judges, including Otto. What a fool you are! Soon you will be poor; that will be a happy day." See "Affidavit of

Marvin Faulkner” attached as *Exhibit “G”* in the “Complaint against a Judge” to the State of Illinois Judicial Inquiry Board on March 10, 2015 attached herein as **Exhibit “D”**, not attached, herein, but is made a part of this “*Amended Verified Complaint*”.

126. *Villa Capital Properties* and owner *Erik Hubbard* participated as co-conspirator in the illicit judicial scheme to defraud plaintiff Faulkner and plaintiff Umunna of their properties by knowingly taking part as receiver for the Urban Partnership Bank and together with their attorneys in the chancery cases, all of Villa Capital Properties and all of their attorney’s fees; including, Attorney Steven E. Anderson were, wrongly and at prejudice of Faulkner and Umunna, waived in the Chancery Department court cases as aforementioned. Conversely; Marvin Faulkner’s and Samuel C. Umunna’s fees were not waived by the Chancery Department court cases.

127. Villa Capital Properties under the direction of Chuhak & Tecson, P.C. filed their receiver’s reports on the Faulkner’s and Umunna’s property. Villa Capital Properties knew it became an Officer of the Court and had responsibility by law to report any illicit activity/activities concerning Federal, State and Local law; but, Villa Capital Properties and Erik Hubbard participated as directed by Chuhak & Tecson making themselves co-conspirator of defrauding Faulkner and Umunna of their properties. Each and every foreclosure complaint by PUB and against Samuel C. Umunna and Marvin Faulkner were fraudulent labeled as commercial foreclosure on Umunna’s and Faulkner’s residential/non-commercial properties.

128. On Burke, Warren, Mackay & Serritella, P.C. lead law firm involved in fraud as described, herein.

129. On or about March 23, 2012 Umunna spoke with a representative of UPB

concerning Umunna's properties mortgaged by ShoreBank. The representative told Umunna that "From the information I have, that we did not assume your loans from the FDIC". Thereafter, Umunna went to 79th and Cottage Grove and Umunna saw Tommie Bosley and spoke with him about his loans with ShoreBank. Bosley informed Umunna that all Umunna's loans with ShoreBank were charged off by ShoreBank. Umunna went to UPB to inform them that Umunna found out that all of Umunna's loans have been charged off. [Note: Samuel C. Umunna and Marvin Faulkner requested with the courts that UPB is unjustly benefiting thru double dipping, that a request of ShoreBank's record on Umunna's mortgages be open for discovery; each time the judges refused.] Umunna informed UPB that Umunna will not make any further payments, until Umunna is given proof that UPB have ownership of Umunna's loans with ShoreBank; UPB ignored Umunna's request.

XIII. IN THE YEAR OF 2013 OF THE WRONG AGAINST THE PLAINTIFFS

[By The Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

130. On May 07, 2013, *Samantha L. Babcock*, acting as attorney for Urban Partnership Bank of the law firm of Chuhak and Tecason. That on May 7, 2013 Marvin Faulkner and Samantha L. Babcock had a conversation about the drafted order by attorney Babcock. Faulkner did not agree with Attorney Babcock's drafted order; then, asked the Judges' clerk to recall the case for Judge Simko's review. Judge Simko had already left the bench, the Judge's clerk left inform Judge Simko of the recalls. This is when attorney Babcock told Mr. Faulkner that: "*You can continue to waste your time if you want; either at the bench or away from the bench, Judge Simko works for us, he will do*

what we want him to do.” Upon Judge Simko retirm, Judge Simko had already corrected the court’s order, of Faulkner point of understanding, then judge Simko asked attorney Babcock is it as you understood. Miss Babcock’s objections to the corrected order, Judge Simko changed his corrected order to the Babcock drafted order, and then returned to attorney Babcock an order accommodating attorney Babcock’s objections. [Later, in May of 2016, Faulkner had learned the Samantha L. Badcock was not an attorney nor did the ARDC recognize Samantha L. Babcock as an attorney. That UPB and Chuhak and Tecason were illegally presenting Samantha L. Babcock a non-attorney to the court to progress their corruption on the court. That, on May of 2016, Faulkner learned that the ARDC did not recognize Samantha L. Babcock as an attorney in the State of Illinois or any other state.

131. On **July 30, 2013**, Samuel C. Umunna was ordered to Erik Hubbard of Villa Capital Property pursuant a Court’s Order of a related chancery case. Ordered by Judge Swanson for Umunna to personally deliver documents and any monies owed to the office of Erik Hubbard of Villa Capital Property on July 30, 2013 on or before 5 p.m. at 1414 East 62rd Place of Chicago, Illinois. Samuel Umunna and Marvin Faulkner (Faulkner as a witness) arrived at Erik Hubbard of Villa Capital Property to deliver the documents pursuant Court’s order. Erik Hubbard received and opened the package and found no money therein. This is when Erik Hubbard said; after Mr. Hubbard noticed that there was no money within the package delivered to Mr. Hubbard by Umunna. Erik Hubbard angrily voiced spoke: *“You think that you are smart, you dumb asses, do you think that this is the only property that me and Samantha are involved in? We take more properties than you can ever imagine! You fuckers! You will see what Judge Swanson is*

going to do to you! You cannot escape from us; you dumb asses. You will not see any money from me. In fact; I am going to sue your asses. And, I am glad that I and the banks are going to take all of your properties, you fuckers, you boys get the hell out of my office.” Then, Mr. Faulkner and Mr. Umunna left Erik Hubbard’s office. As a result of Erik Hubbard comments, it turns to be true, that Erik Hubbard was the receiver and end buyer of the properties that he as receiver and manager of the laundry scheme operation, therein. And that UPB used a number of agents to fraudulently obtain properties and give kickbacks to his agents and other conspirators. [This is the hidden scheme of the operation that Faulkner and Umunna had found and believes to be the source funneling the corruption, herein].

132. In the year of 2013, Timothy L. Rowell, of case number 2011-L-013743, routinely did not notice defendant and counter-plaintiff, Marvin Faulkner, concerning filed motions and as well as orders with in case number 2011-L-013743; including, ex parte orders drafted by either attorney Rowell or Judge Raymond W. Mitchell on May 28, 2013; In part, stated, “Failure to appear will result in dismissal for want of prosecution or entry of a default order, Failure to comply with this order will be a basis for sanctions under Rule 219(c). Failure to enforce this order will constitute a waiver of such discovery by the party. This order was discovered by Faulkner on or about December of 2013. Faulkner found that because of his revealing of the corruption of the defendants that the “Hit List” included many to take part and to prevent Faulkner from revealing the laundry scheme operation and the illegal taking of properties.

133. Raymond W. Mitchell the judge on case number 2011-L-013743 involved himself in conspiracy by orchestrating with Timothy L. Rowell; Irwin J. Solganick and Alexander

P. White to ensure a judgment in favor of plaintiff, John Averginos and Attorney Timothy L. Rowell in exorbitant amount (As plaintiff requested a claim for \$100,000.00 but Judge Mitchell for the purpose to destroy Faulkner made a ruling against Faulkner for \$245,000.00 on a fraudulent claim by the plaintiff, John Avgerinos) that would aid in destroying Faulkner and lessen Faulkner ability to litigate aggressively.

134. That, on December 04, 2013, Irwin J. Solganick and Alexander P. White were directly involved between telephone calls as witnessed by Faulkner and other in the court rooms when the clerk who stated: "Judge Mitchell would be going to lunch soon and wants Faulkner's case back before judge Mitchell on Faulkner's motion to Substitute Judge Raymond W. Mitchell for causes.

135. Alexander P. White and Irwin J. Solganick conspirators, herein as described above willfully and willingly participated in the harm to Faulkner. That without delay and without due Process Judge Alexander P. White and Judge Irwin J. Solganick would deliver Marvin Faulkner to Judge Raymond W. Mitchell for a harsh and unjust judgment to crippled if not destroy Faulkner from his aggressive litigations.

136. On Alexander D. Marks participated in fraud and conspiracy as described, herein, willfully and willingly.

137. On May 24, 2013 and many other dates, Marvin Faulkner and/or Samuel C. Umunna filed formally complaints against judges, banks law firms, attorneys and individuals of their plot to destroy Marvin Faulkner and Samuel C. Umunna.

138. On November 12, 2013; Samuel C. Umunna was falsely arrested by Judge Alfred M. Swanson Jr. from the direction of Eirk Hubbard pursuant to Eirk Hubbard's promise to direct Judge Alfred M. Swanson to punish Samuel C. Umunna for non-delivery of

ill-gotten gains of the laundry, aforementioned.

139. On November 19, 2013 about 9:45 a.m.; for a 10:00 a.m. court call, before Judge Alfred M. Swanson Jr. in court room 2803 at the Daley Center in Chicago, Illinois that Anna Lenard, Court Reporter hired by Samuel C. Umunna and Marvin Faulkner, as reported in the Affidavit of Marvin Faulkner, the following occurred stated by Court Reporter, Anna Lenard that: "I was in Court and I was informed by the judge's clerk or his administrator that the matter was not set that a bond has been posted and was satisfied the judge and the matter has been taken from the call; and, there will be no proceeding and she was very sorry that I'm here, there must be some miscommunication that I, Anna Lenard, Court Reporter, need not set up so having been told that, the matter was not on call and was not set". Anna Lenard called to confirm, to no prevail/response. And, having the information from the judges' clerk, I packed up and I left." At 10:00 a.m. Mr. Umunna arrived to the court call set for November 19, 2013 before Judge Alfred M. Swanson Jr. and Marvin Faulkner arrived at 10:04 a.m. court call set for November 19, 2013, before Judge Alfred M. Swanson Jr. Samuel C. Umunna told Marvin Faulkner that the Court Reporter had not arrived yet. At about 10:15 a.m. Faulkner called Adrienne Lightfoot to find if a court reporter was sent, no answer, a message was left by Faulkner. At about 10:37 a.m. Judge Swanson's clerk came to Faulkner and Umunna and asked them to come out in the hall to talk. Faulkner and Umunna went to the hall with the judge Swanson's clerk a Sheriff followed us and stood between the judge's clerk and Faulkner and Umunna. Faulkner asked the sheriff, is it necessary that you are standing in front of us; as if we are criminals. You are treating us like criminals. We are law bidding citizens and this is very disrespectful. The sheriff only looked at Faulkner and

continued to stand aggressively at Faulkner and Umunna. The Judge's Clerk told Faulkner and Umunna that the bond was paid and there is no reason for you to be here." Mr. Umunna then said; "I have an order slip from the sheriff, which orders me to be here. That this matter is up for today by Judge Swanson and in Judge Swanson order, it is not clear to appear today. I do not trust Judge Swanson, so I am making sure that Judge Swanson does not use me again for the purpose of pleasing the plaintiff". At about 10:41 a.m. Judge Swanson calls the case calls for November 19, 2013 @ 10:00 a.m. At about, 12:33 Anna Lenard the Court Reporter called Faulkner for payment of November 19, 2013 10:00 a.m. appearance before Judge Alfred M. Swanson Jr. Faulkner refused to pay court reporter Lenard for nonappearance. Anna Lenard informed Faulkner that Judge Swanson clerk told her to not set up and leave, so I did. Faulkner stated: "That no one told Faulkner or Mr. Umunna that a Court Report arrived to court and that no one has the right to tell you to leave directly or indirectly."

a). A short time after; November 19, 2013, Judge Alfred M. Swanson Jr. recused himself from all of Samuel C. Umunna and Marvin Faulkner cases after a formally complaint by Samuel C. Umunna revealing Alfred M. Swanson Jr. illicit acts to harm Samuel C. Umunna for his aggressive litigation.

140. On December 03, 2013, Marvin Faulkner, as noted within the affidavit of Marvin Faulkner, was told by Attorney Steven E. Anderson, as Attorney Anderson boasts about the control he has over the Judges in Chancery Division. Attorney Anderson after a court call. Marvin Faulkner exits the court room; Attorney Anderson walked behind Mr. Faulkner and said to Faulkner. "I know that you have a judgment against you for \$246,000.00 dollars. It looks like everyone is beating you, do you think that it is

because; you are trying to fight against us. You know what Attorney Babcock told you; UPB business is money, you do not have a chance, and we control the judges. Why do you think that Judge Swanson and Judge Kyriakopoulos make sure you look bad in court; they are with us! We have too many judges, UPB is powerful and there is nothing you can do about it. Faulkner I'm warning you; don't destroy yourself; because, you are black, is the only reason why I am telling you this and if you mention this to anyone. I will made sure you go to jail, like I made Judge Swanson put Umunna in jail. No more warnings." Then I said: I know that UPB is much more powerful than me; but I am not afraid." Then Attorney Anderson walked away.

141. Dated on April 19, 2013, from the Affidavit of Samuel C. Umunna, "I had over thirteen mortgage loans approved by and by Tommie Bosley, (Tommie Bosley is the loan officer with ShoreBank) during my relationship with ShoreBank; between, the years of late 2006 thru 2009. On several loans, approvals Tommie Bosley expressed to Umunna his marvel of Umunna's ability to make the monthly payments timely with Umunna's income rational to the loans granted to Umunna by ShoreBank. Typically, after ShoreBank's committee would grant the loans to Umunna, Tommie Bosley would say to Umunna: "As always; Sam because, you have paid all of the monthly payments we have with you on time to date and believe me, I don't know how you do it with your income, but you do. So, as long as you continue to pay your monthly mortgages on time, we will approve all of your loans. Sam your loan is approved." Umunna was very much enjoyed hearing that his loans were approved. Despite; that, it was very difficult for Umunna's to make the mortgage payments. But, Umunna believed that the "American Dream" will be accomplished with his hard work and sacrifices. Umunna's income not

being adequate to make the timely loans payment and difficult for Umunna to live.

XIV. IN THE YEAR OF 2014 OF THE WRONG AGAINST THE PLAINTIFFS

[By The Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

142. On **September 11, 2014** Judge Anna M. Loftus ordered that in case number 2010-CH-31405 titled: Nationstar Mortgage, LLC and Citimortgage, Inc., v. Shayna St. Clair; Christina Place II Condominium Association; Unknown Owners and Non-Record Claimants. Case number 2010-CH-31405, as aforementioned, did not include Marvin Faulkner, owner/personal of entitlement to the principle property at issue of case number 2010-CH-31405. That Nationstar Mortgage, LLC, Citimortgage, Inc., and other orchestrated a scheme to not name Marvin Faulkner in case number 2010-CH-31405, told to Marvin Faulkner by the laughing attorney, Sonia Pasquesi. Faulkner believes due to Marvin Faulkner's aggressive legal participation during court's matters. The order that Judge Anna M. Loftus entered states: "3rd party Intervener's motion are hereby stricken as moot, as this court no longer retains jurisdiction as the order approving sale was entered on March 18, 2014. However, on September 16, 2015; nearly 12 months without jurisdiction in case number 2010-CH-31405 and with Judge Loftus hate against Marvin Faulkner that Faulkner fight for justice. Judge Loftus on her own desire and without authority ignoring the law and gave herself jurisdiction when judge Loftus acknowledged that she did not have jurisdiction in the matter and order a briefing schedule to sanction Marvin Faulkner in case number 2010-CH-31405. And, plaintiff, Nationstar and their attorneys participated in this illegal act to not allow Faulkner Due Process when Notionstar; first Franklin Mortgage; Federal National Mortgage

Association and Hauselman, Rappin & Olswang, LTD were well aware that Marvin Faulkner was recorded owner, in the year 2009, of the property in case number 2010-CH-31405.

143. *Michael A. Eurich* occasionally bragged to Faulkner of his strong connections with the judges and the judge's dedication to fight for the banks, telling Faulkner: "The judges are doing their job and doing quite well. The banks pay very well, to me and to the judges, including Otto. What a fool you are! Soon you will be poor; that will be a happy day." Defendant(s) target plaintiff(s) Faulkner and Umunna with vengeance in and outside of court's proceeding.

144. On July 28, 2014 as revealed in the Affidavit of Marvin Faulkner stated and caught on tape: I and Steven Anderson had a conversation that as follows: **Steven Anderson said**: "Mr. Faulkner, Mr. Faulkner; I have an Order for you by Judge Gomolinski." Then, **Marvin Faulkner said**: "Judge Gomolinski DWP me from the case; I will see Gomolinski on the 21st of August; that's when my motions are spindled before Gomolinski." **Steven Anderson said**: "Gomolinski granted my emergency motion to advance your motions; you are back in the case and you are ordered by Judge Gomolinski to be presented at the July 30th hearing". **Marvin Faulkner said**: "That's an exparte issue; how crooked is that?" **Steven Anderson said**: "Judge Gomolinski is with us; your name is on the Judges' "Hit List"; they are committed to rule against you (a very slight ha-ha....by Steven Anderson) and your properties will be taken from you and your life will be destroyed, I have already warned you. Even your emergency motion scheduled before Judge Wolfson, today will be denied and that property will be demolished. **Marvin Faulkner said**: "What"? Then **Steven Anderson said**:

“Faulkner, you are on the Judges’ “Hit List”. When you sue a Judge, the judges will destroy your life.” Thereafter, I left Steven Anderson’s presence of the 7th floor of the Daley Center.

Later, Anderson found Faulkner on the 6th floor of the Daley Center then Anderson said to me “Here is the copy of today’s order.” Then; Anderson started to record our conversation, between Steven Anderson and me, from his cell phone. Within, 5 minutes into that conversation, Faulkner took out his cell phone, to record Steven Anderson photo and to try to allure Steven Anderson to admit on the recorder, of his earlier statements and that Judge Gomolinski is executing his participation in the “Hit List”, against Faulkner, as Mr. Anderson had revealed.”

145. As of December 22, 2014, Faulkner found that, Judge Michael F. Otto has 149 co-workers as partner/boss under the company name *Jenner & Block LLP* see *Joesdata.com* Prior and currently; (*as understood and noted*), Judge Michael F. Otto is partner with the law firm of Jenner & Block LLP at 353 North Clark Street of Chicago Illinois; placing him at conflict with the law and conflict of interest in the matter at bar.

146. On *Villa Capital Properties*, owner, *Erik Hubbard* the court appointed receiver to the “*Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*”: also, the purchaser the *Properties of the August 20, 2010 Agreement and Chancery Court’s Filing to Defraud Marvin Faulkner and Samuel C. Umunna*” in a close bidding with the principle conspirators, Urban Partnership Bank.

147. On; March 12, 2014, Anna M. Loftus was appointed as a judge by the Illinois

Supreme Court on Judge Anna M. Loftus was a partner in the firm Hall, Prangle & Schoonveld, LLC. She is an Adjunct Faculty member at John Marshall law School, The daughter of the husband and wife team of the 14th Ward Alderman Edward M. Burke (who is over the finance committee for Chicago) and Anne M. Burke (who is a Judge with the Illinois Supreme Court) have a daughter named Jennifer Burke who is also an “Adjunct Faculty” member at the John Marshall Law School. Harvey Smith from the law firm of Chuhak & Teson, P.C. is also an Adjunct faculty member at the John Marshall Law School where the Judge Anna M. Loftus is also an “Adjunct Faculty member.

148. Faulkner overheard Elizabeth Lyons in communication with believed to be an attorney, female, that judge Loftus is protected by Edward Burke and Anna Burke; that, judge Loftus is not competent; but, is protected.

149. The City of Chicago, under color of law, and in the scheme of intimidation and continues to conspire to target Marvin Faulkner and Samuel C. Umunna; herein, with little to no mercy to demolishing the properties of the Umunna’s and Faulkner’s without notice of court cases nor opportunity to correct any building violation that existed.

150. On Meredith Freeman at the direction of the Chancery Judge would move the case towards victory of foreclosure on the property at question. At times, of frustration *ei*. Case number 2008-CH-13579 attorney became upset with Judge Marinos because Judge Marinos knew that a ruling of Default was not possible and a ruling of Summary Judgment was not possible because there were issues of material fact that were present according to Ihejirika’s and Faulkner’s Third Amended Answer in case number 2008-CH-13579 allowed by Judge Atkins. Later, Judge Anna M. Loftus presided over

case number 2008-CH-13579. Judge Loftus ignored defendants' Faulkner's and Ihejirika's Third Amended Answer in case number 2008-CH-13579 and only ruled on defendants' first answer to case number 2008-CH-13579 in 2014 that is still at issue on motion to vacate Judge Loftus' ruling/order.

151. Meredith Freeman was aware and was made aware that case number 2008-CH-13579 should not be in Chancery at best Law Division. Meredith Freeman looked at Faulkner and said "who cares".

152. The Defendants, herein, knowingly disregarded the law and decided to benefit from illicit activity against the Plaintiffs.

XV. IN THE YEAR OF 2015 OF THE WRONG AGAINST THE PLAINTIFFS

[By The Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

153. On **February 03, 2015**: Marvin Faulkner notarized his affidavit to report an encounter he had with Anna M. Loftus, that states in pertinent parts: "On January 28, 2015, I was at the Daley Center at or around 12:30 p.m. to file a *"Re-Notice" for case #2010-CH-31405 titled: "UNDER AND PURSUANT TO 735 ILCS 5/2-407 AND 735 ILCS 5/2-1401, PROPOSED INTERVENING THIRD PARTY DEFENDANT'S MARVIN FAULKNER'S, PETITION TO INTERVENE ACCORDING TO SECTION 735 ILCS 5/2(a)(1,2 &3); SECTION 735 ILCS 5/15-1501 (b) 1,8 & 9 AND SECTION 735 ILCS 5/19-124"*. After, I filed my petition; I went to the 28th floor of the Daley Center to deliver a courtesy copy of that petition to Judge Anna M. Loftus' clerk. I arrived on the 28th floor of the Daley Center, I walked towards the middle hall to deliver my petition, and then, I saw Judge Anna M. Loftus walking towards me and me towards her. As I

approached Judge Anna M. Loftus I said: "Hello". Judge Anna M. Loftus said to me with a retaliation look on her face: **"Nigger, I'm going to enjoy destroying you"**. I became worried, unlike ever before, without stopping, I continued to walk, looking straight ahead. As, I passed Judge Loftus looking at me with a sinister laughter on her face, then she entered the doorway. I believe the Judge's elevator doorway. I delivered my petition to the clerk's/secretary's desk as a courtesy copy, I then left the Daley Center and went home; disregarding my other affairs needed at the Daley Center. I had prior threats from Judge Anna M. Loftus; including, when she denied passing a case call, when I requested to use the bathroom. But; the threat by Judge Loftus on January 28, 2015, was different; it hit me hard, when Judge Anna M. Loftus said to me: **"Nigger, I'm going to enjoy destroying you"**.

154. On **April 30, 2015** Judge Anna M. Loftus, without jurisdiction and hatred for Marvin Faulkner for Faulkner's aggressive legal litigations, order the following: The petitioner, Marvin Faulkner, having scheduled a petition entitled: Re-Notice of Motion/Petition "Under and Pursuant to 735 ILCS 5/2-407 and 735 ILCS 5/2-1401, Proposed Intervening Third Party Defendant's, Marvin Faulkner's, Petition to Intervene according to Section 735 ILCS 5/2-408(a) 1,2 &3; Section 735 ILCS 5/15-1501(b) 1, 8 &9 and Section 735 ILCS 5/19-124" (as in original) for presentation, the court determines that the petition is substantially identical to the petitioner's prior petitions, which the court has denied for lack of jurisdiction four times before.

155. On September 11, 2014 judge Loftus struck the petitioner's petition to intervene and motions noting "this court no longer retains jurisdiction as the order approving sale was entered on March 18, 2014."

156. On September 22, and 24, 2014, judge Loftus court entered apparently-identical orders declining to set substantially similar petitions as emergencies, noting “the Court no longer has jurisdiction over the underlying matter.”

157. On January 22, 2015, judge Loftus denied a substantially similar petition “for the reasons stated in court, specifically pursuant to this Court’s finding in the September 11, 2014 court order finding [sic] that this court does not have jurisdiction.”

158. The court reiterates: The above-captioned matter was fully disposed on March 18, 2014. No post-judgment motions were filed within the 30 days following entry of that final order. The 1401 petition of a non-party cannot re-vest this court with jurisdiction over a matter that the petitioner was a stranger to.

159. As the petitioner has repeatedly re-filed the same argument, any further filings of or presentation of this petition in this court, may result in sanctions. The petitioner is not without a remedy for his alleged harm; this is not the forum for the petitioner’s allegation. The motion is denied, for want of jurisdiction. Entered by Judge Anna M. Loftus

160. *Michael Francis Otto*, should have recused himself after a federal complaint was filed against him by plaintiff Faulkner and Umunna from all and any cases that involved plaintiff, aforementioned; but, Judge Otto refused to recuse himself that he may rule against plaintiff Faulkner and Umunna to satisfy Urban Partnership Bank direction of approval of sale. Later, Judge Otto reviewed his error and had no choice but to recues himself, therein.

161. At insertion of Judge Anna M. Loftus on the adjudication of plaintiffs’ motions. Judge Anna M. Loftus was very aggressive and refuse to listen, brief or hear oral arguments to any of the plaintiffs’ motions or filing. At presentation of any of the

plaintiffs' motions or filings, Judge Anna M. Loftus, would start reading a prepared order, without, any conversation. At times, Judge Anna M. Loftus would stumble, take long pauses and reread the prepared draft orders then hand it to both litigants then call the next case call and ask the presented litigants to be seated. The ruling 100% of the times would not favor the herein plaintiffs.

162. Judge Anna M. Loftus on several occasions ignored motions that addressed UPB wrong doing, including a Declaratory Judgment motion concerning UPB representation of commercial foreclosures on noncommercial properties. As well as, material issues concerning case number 2008-CH-13579. (Plaintiffs' request that all issues, both adjudicated and without adjudication, that are aforementioned in this case, case number: 15-cv-3344, be removed from state court to federal court, for the reasons, but not limited to, the fraud activity against the plaintiffs, herein).

163. Nationstar Mortgage, LLC., CitiMortgage, Inc., and Federal National Mortgage Association fraudulent attempt of stealing Marvin Faulkner's property at 120 East 45th Street, Unit #202 in case number 2014-M1722413 and in case number 2010-CH-31405.

164. On **September 16, 2015** Judge Anna M. Loftus ordered in case number 2010-CH-31405 the same case that on **January 22, 2015 ordered**, that Judge Anna M Loftus does not have jurisdiction to hear the any matter in case number 2010-CH-31405 and that Marvin Faulkner's petition is stricken, and CitiMortgage's oral motion for sanctions is denied as the Court does not entertain oral motions; and this matter is continued to 9/25/15 at 10:00 a.m. for status.

165. On **September 25, 2015** Judge Anna M. Loftus entered a "Scheduling Order on Contested Motion", in case number: 2010-CH-31405 the same case that judge Anna M.

Loftus claimed that the court has no jurisdiction for want of jurisdiction that: Plaintiff, CitiMortgage motion for sanctions against Marvin Faulkner to be heard before judge Anna M. Loftus on November 19, 2015 at 3:00 p.m. And, that Marvin Faulkner response to plaintiff's motion for sanction is due on or before October 16, 2015 and Plaintiff's in case number 2010-CH-31405 reply brief on the motion, due on or before November 06, 2015.

166. On **September 25, 2015** in case number 2010-CH-31405 Codilis & Associates, P.C. at 15W030 North Frontage Road; Suite 100 Burr Ridge, Illinois 60527 for plaintiffs therein filed their motion for sanctions against Marvin Faulkner of malicious prosecution. That with forward movement and confidence against Marvin Faulkner and Samuel C. Umunna; however, the defendants are careful but relentless in their backlash against Marvin Faulkner and Samuel C. Umunna to destroy and/or punish Marvin Faulkner and Samuel C. Umunna; because, of plaintiff aggressively litigating to reveal the defendants' corruption. Faulkner or Umunna never knows what is/are coming from the Defendant(s); but Faulkner and Umunna know that the Defendant(s) will not stop: harassing; depleting Faulkner and Umunna source of income; intimidating and attempting to imprison Faulkner and Umunna to stop Faulkner's and Umunna's aggressive litigation.

167. On **November 04, 2015**; Marvin Faulkner, experienced something that appears in movies, books and horror stories a firsthand set up understood by whistleblowers, herein. On November 04, 2015 a telephone call at 2:25 p.m. from the telephone number 1-773-869-7100 from a Cook County Sheriff's Police Detective name Pierce of badge number *723 from the Investigations Section, with a disturbing conversation but a soothing deliver; asking Faulkner to visit his office to clear his[Faulkner's] that came

before him [Detective Pierce] given by judges. Faulkner's immediate response was, in the manner of, please officer tell me what are you talking about? Detective Pierce stated: "Don't worry it's not criminal, at best it's a civil issue that came before Detective Pierce, what time are you [Faulkner] able to meet me at 1401 Maybrook Drive, Maywood Illinois". Faulkner told detective Pierce that: "That I cannot at this time" and "What matter is there that I must clear my name." Detective Pierce would not tell Faulkner only urging Faulkner that, only a few minutes of Faulkner's time is required. Faulkner then said that Faulkner would have to check Pierce out to be sure Pierce is who Pierce says he is. After, Faulkner hung the phone with the individual [Now known to be Detective Pierce], Faulkner called 911 and reported the phone call and Faulkner alerted 911, that Faulkner was afraid and worried of the call. Because, since around august Faulkner filed an Amended Federal Complaint against: Judges, Banks, Law Firms, lawyers and others in case number 15-cv-3344 with the intention to uncover corruption and illicit behavior, therein. The 911 dispatcher sent an officer [female] to Faulkner's home and for about an hour Faulkner and the dispatched officer talked and a report was noted as the officer told Faulkner she would do.

168. **On November 05, 2015** at about 5:44 p.m. Faulkner received a telephone message from his son, with a concerned temperament in his voice which was left with Faulkner. Faulkner returned the call; then, Faulkner received harsh information, that people, men, were banging on the door and shining bright light into the house. Faulkner immediately left what he was doing and headed home. Upon Faulkner arriving home, in front of Faulkner's house was a parked car with a spot light on the drivers' door, it could have been an unmarked car, but Faulkner was not sure. Faulkner called 911 to assist, in

case of any danger. A 911 officer came within several minutes. The officer dispatched by the 911 operator came and called Faulkner by telephone to open Faulkner's house door to speak with the 911 officer, Faulkner did. Thereafter; in part, the following conversation occurred. Meeting the 911 officer, Faulkner said to the 911 officer that, a situation has occurred; after, Faulkner had filed an amended federal civil complaint against: judges; banks; and law firms and co-conspirators under a Rico complaint to be adjudicated in federal court justices on August 03, 2015. Since then many strange things have been happening and Faulkner felt threatened. Faulkner believes that the judges whom Faulkner has filed a complaint against are orchestration harm to me for my attempt to uncover corruption in the judicial system. But, not the judicial system, only a hand full that is using the judicial system for illicit purposes. Thereafter, Officer Pierce *723 noted that the purpose that the purpose that he's is to give opportunity to Faulkner, that Faulkner may clear his name from a list of potential suspects of a letter that was giving/address to judges in the Cook County area. Faulkner assured Officer Pierce, *723, that nothing Faulkner have done is illicit; that Faulkner's has the right to sue for illicit behavior, even a judge. Officer Pierce, *723 accompanied by Officer Carter; I believe, continued in their efforts to convince Faulkner to accompany them to their office for conversation, only a few minutes of Faulkner's time. Faulkner refused/digressed their offer; but, agreed to meet in the morning of the next day. As the conversation continued Officer Pierce and Officer Carter continued in their positioning that Faulkner was not under arrest but insisted that Faulkner come with them. Faulkner refused. At that point the 911 officer announced his departure and greeted all well. The moment the 911 officer left the following occurred, as permitted to the remaining officers

concurred of the following as recorded: **Faulkner**: “Do you mind if I turn this on”.

Officer Pierce: “No, I do not mind.” **Faulkner**: “If we can possibly, what’s a good time, do you start tomorrow?” **Officer Pierce**: “We start at 7 in the morning.”

Faulkner: “7 in the morning and you’re in Maywood, so you’re not too far from here”.

Officer Pierce: “Not too far from here.” **Faulkner**: “And, I have to come to your office verses you tell me what’s going on here.” **Officer Pierce**: “We prefer you come to our office.....(*see affidavit*).....” **Officer Carter**: “Sorry to cut you off Marvin,

you said that there were no other adults in the house?” **Faulkner**: “My son”. **Officer**

Carter: “Just your son and your daughter?” **Faulkner**: “Right.” Officer Carter: O.K.

bottom line is this; you’re going to have to come with us tonight for questioning that is not an option.” **Faulkner**: “Why is that?” **Officer Carter**: “Hmmm”. **Faulkner**:

“Why?” **Officer Carter**: “Because you do.” **Officer Carter**: “Like my partner said your name came up in an investigation and this have to be taken care of tonight there is no other options, o.k., you’re not being formally charged with anything right now; but, we do have to ask you some questions and it has to at the police station.” **Faulkner**:

“Can I get my jacket and my tie and I will be right back is that o.k. I am coming right back. I just want to get my jacket and my tie I like to look like you guys.” **Officer**

Carter: “that’s not necessary sir, you will be in a car; there is heat in the car, less than 10 minutes away from the police station; you will be in and out, o.k.”..... Eventually,

Faulkner was taken, under Faulkner’s duress, to 1401 Maybrook Drive, Maywood, Illinois by detective Pierce and Detective Carter and held there for over 24 hours under detainment and questioning without being charged with any charges. Although,

Faulkner was detained against his will Faulkner cooperated with the Sheriff’s Police,

Cook County Department from the dates of November 05, 2015 at about 7:45 p.m. until the date of November 06, 2015 at about 8:14 p.m., under Faulkner's duress. With only one message Faulkner had for the Officers of the investigation (See recording therein the recording by the Sheriff's Police Cook County Department) that Faulkner filed a federal Civil Claim under case number 15-cv-3344 charging judges; law firms and their co-conspirators with RICO claim and that Faulkner believe that the judges; law firms and the co-conspirators are trying to frame Faulkner so that Faulkner do not uncover their corruption. That, Faulkner has not done anything wrong or illicit to be questioned by the officers any officers. Faulkner's attorney visit and informed Cook County Sheriff that Faulkner will no longer answer any more question without his attorney. Within hours the Cook County Police released Faulkner. Faulkner's rights were stripped by the Cook County Sheriff's Police Department and embarrassed at his home in front of his neighbors. But the more disturbing thing occurred and concerned Faulkner greatly. Faulkner's finger prints and palm prints was taken an enormous amount of times. Two complete ink prints of both Faulkner's complete hand and twice by computer.

[Faulkner hopes that his hands prints' will not be used for illicit purposes, as it appears to Faulkner as it appears to be an extreme amount of times, to take both Faulkner's hands prints without being charged with any charges]. Again, later, Faulkner was released with no charged but, the officers doing Faulkner's release could not find Faulkner personal bags that was taken from Faulkner during his lock-up by the Cook County Police. That the officers at Faulkner's detainment for investigation decided to separate Faulkner's personals items into two separate plastic bags, for about 5 minutes during Faulkner's release and the search for Faulkner's missing items that should have

been in lock-up and undisturbed. Officer Pierce came from, Faulkner believe, Officer Pierce office with Faulkner missing personal items that by law should had been in lock-up. Faulkner believes that herein is corruption; and, that the illicit judges are not happy of my release with no charges by the Cook County Sheriff's Police Department. And, Faulkner believes that the illicit judges and co-conspirators will continue to try and frame Faulkner, continuing their intimidation.

169. On **November 19, 2015** by judge Abbey Fishman Romanek ordered and declared:

"Mr. Faulkner, I have reviewed your motions; one for disqualification and the other to vacate September 25, 2015 court's order. After, vigilant review your matter should not be before me. As you've stated and provided exhibits to me and showed that you are an owner of the property in which this matter stemmed from a Chancery case 2010-CH-31405. The exhibits shows that you were not noticed in case number 2010-CH-31405; however, your fight is not in this court room. Your fight is in Chancery; you will have to go back to Chancery and file a motion. I do not know why you were not served summons and complaint. I do see, that in 2009 you've recorded the warranty deed and in 2010 plaintiff filed their foreclosure. I do not know if your direction is by motion to quash, voidness or whatever the case, your fight is in Chancery. Therefore, I will order the following: 1. On the Court's own motion the May 15, 2015 order allowing Faulkner to intervene is vacated, based on Faulkner making this court aware that he is an owner of 120 East 45th Street, Unit number 202 in case number: 2010-CH-31405. 2. The motion to vacate September 25, 2015 order is denied. 3. The motion to disqualify judge Romanek is denied. 4. Trial on December 4, 2015 at 9:30 a.m. as to unknown occupants.

170. Edward J. Lesniak as set forth herein knowingly participated in fraud and conspiracy to destroy the Marvin Faulkner as described, herein in regards to 2008-CH-13579 for the aggressive litigation of Marvin Faulkner, and the revealing of the laundry scheme plot.

XVI. IN THE YEAR OF 2016 OF THE WRONG AGAINST THE PLAINTIFFS

[By The Defendant(s)' collective and continuous illicit scheme to attack and harm Marvin Faulkner and Samuel C. Umunna; because, Marvin Faulkner and/or Samuel C. Umunna formally complained against judges, banks, law firms, attorneys & individuals. Plaintiffs understand that:]

171. That, Samuel C. Umunna was visited and harassed at his home by the Cook County Sheriffs requesting for a conversation for the purpose to intimidate Faulkner and Umunna; because of, Faulkner's and Umunna's aggressive litigation against the defendant, herein.

a). Samuel C. Umunna is afraid for his life because of the plot and conspiracy against Umunna and Faulkner for their aggressive litigation and their attempt to reveal the corruption and laundry scheme operation, set forth, herein.

b). Marvin Faulkner is afraid for his life because of the plot and conspiracy against Umunna and Faulkner for their aggressive litigation and their attempt to reveal the corruption, set forth, herein.

172. The Marvin Faulkner and Samuel C. Umunna have been worried since 2012 of the aggressive back lashed by Defendant(s): ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF

CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC.; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL FRANCIS OTTO; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; STEVEN E. ANDERSON; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE.

173. The City of Chicago, at intimidation and from the City places claims illicitly against the Plaintiff(s) and without causes. On or about February 24, 2015, Faulkner received a call from his tenant at 2015 West 69th Place, to learn that the fire had occur. Faulkner got a board up crew to board and secured the property. On February 26, 2015 Faulkner had the subject property board and secured. That, on March 26, 2015 Judge

Mark J. Ballard (case number: 2014-M1-403324) order a demolition order on Faulkner's property at 2015 West 69th Place of Chicago Illinois without notice to Marvin Faulkner. April 23, 2015, through personal investigation, Marvin Faulkner a motion to vacate the March 26, 2015 order to demolition Faulkner's property at 2015 West 69th Place that was set for court call on May 14, 2015. On or about April 04, 2015 Faulkner learned that the City of Chicago had demolished Faulkner's property without allowing Faulkner the opportunity to repair. Faulkner filed several motions for adjudication without being allowed to adjudication.

174. LaSalle Bank National as Trustee for Certificate Holders of Bear Stearns Asset Backed Securities I, LLC, Asset-Backed; ENCORE CREDIT; EMC MORTGAGE CORPORATION; Michael N. Varak; Anna M. Loftus and MORTGAGE ELECTRONIC REGISTRATION SYSTEMS plots according to Elizabeth Lyons and the record in case number 2008-CH-13579, clearly shows that Elizabeth Lyons communication to Marvin Faulkner is confirmed, of the backlash and illicit plot against Marvin Faulkner by the Defendants to destroy Marvin Faulkner and anyone associated with Marvin Faulkner for Faulkner's complaining and complaint against judges, banks, law firms, attorneys & individuals of the corruption as aforementioned in this "*Amended Verified Complaint*".

175. Federal National Mortgage Association; Christina Place II Condominium Association; Bryan Gomez; First Franklin Mortgage Association and George F. Scully Jr. plotted and continual to plot to harm Marvin Faulkner and anyone associated with Marvin Faulkner for Faulkner's complaining and complaint against judges, banks, law firms, attorneys & individuals of the corruption as aforementioned in this "*Amended Verified Complaint*".

176. On April 19, 2016; at or about 10:08 a.m. during a court's proceeding, in case #2011-L-13743 in the Circuit Court of Cook County, Illinois; a briefing schedule was being set between attorney Timothy L. Rowells and I. I asked Attorney Rowells: "Did you receive my waiver of summon for Federal court in case #16-cv-2432". Attorney Rowells looked at me and said: "I have a message for you from the judges. The judges want you to drop that federal case, to dismiss it; and, if you do not, they are going to put you in jail, one way or another." I said to attorney Rowell: "Others have threatened me as well." Attorney Rowells looked at me with a strange stare on his face and said nothing else, about, the threat that the judges, who are defendant(s) in case #16-cv-2432 In the United States District Court for the Northern District of Illinois Eastern Division to drop that Federal case. Thereafter, I and attorney Rowells set the briefing schedule in case #2011-L-13743.

a). On April 29, 2016, by and through Detective Roderick Pierce, Star #965, Cook County Sheriff's Police officer, intruded on Faulkner's home (as Detective Roderick have done several time and as well Faulkner call 911 to report the intimidation by Detective Pierce) with a message from the judges and defendants, in the case at bar, Faulkner believes, [for the purpose to threaten and harass Faulkner to drop the federal case against judges, banks, law firms, attorneys and individuals for their alleged illicit activities to defraud Faulkner and Umunna, as well as, the other good people of the State of Illinois].

b). That, Detective Roderick Pierce, Star #965, on April 29, 2016 at or around 12:15 p.m. intruded at the home of plaintiff Faulkner's with what Faulkner believes to be a fraudulent GRAND JURY SUBPOENA DUCES TECUM, Faulkner was warned by whistleblower(s) of the illicit scheme of the defendant(s) to put Faulkner, at the very least

in jail; because of Faulkner's and Umunna's RICO claim in federal court. The GRAND JURY SUBPOENA DUCES TECUM was dated for May 13, 2016 at 9:00 O'clock in the a.m. at the Circuit Court house in Chicago, 26th and California Avenue in courtroom 406. Faulkner did not attend that fraudulent GRAND JURY SUBPOENA DUCES TECUM that he received by Detective Roderick for reasons Faulkner gave in his motions to the Federal Court titled: "PLAINTIFF'S, MARVIN FAULKNER'S, MOTION FOR INJUNCTIONS AND RESTRAINING ORDER AGAINST ALL DEFENDANT(S) ANT THEIR AGENTS [AT ISSUE]' and well as the motion titled: "PLAINTIFF'S MARVIN FAULKNER'S, MOTION FOR EQUITABLE ESTOPPEL FROM DEFENDANTS NAMED IN CASE NUMBER 16-CV-2432, IN CASE AT BAR".

c). That Faulkner did not appear on May 13, 2016 at 9:00 O'clock in the a.m. at the Circuit Court house in Chicago, 26th and California Avenue in courtroom 406 of the fraudulent GRAND JURY SUBPOENA DUCES TECUM, believed by Faulkner. Detective Roderick Pierce, Star #965, [Coincidentally, Faulkner knows that Detective Roderick Pierce has at least two badge numbers: Star #965 and Star #723, which is very unsettling with Faulkner]. That on May 16, 2016, the same Detective Roderick Pierce circled Faulkner house from front to back. Faulkner during one of Detective Roderick Pierce circle of Faulkner was in this garage with the overhead door raised. Faulkner saw Detective Roderick Pierce and Detective Roderick Pierce saw Faulkner. Detective Roderick Pierce quickly looked forward and parked at the end of the alley of Faulkner's block waiting, Faulkner called 911. 911 came and brought Detective Roderick Pierce to Faulkner's garage. This is when Detective Roderick Pierce gave Faulkner another on page paper titled: "RULE TO SHOW CAUSE WHY RESPONDENT SHOULD NOT

BE HELD IN CONTEMPT” schedule for May 23, 2016, at 10:00 a.m. at the Cook County Circuit Court house in courtroom 101, 2600 South California Avenue, Chicago, Illinois. It stated: “IT IS ORDERED: that a Rule is hereby entered against MARVIN FAULKNER to appear on Monday May 23, 2016, at 10:00 a.m. at the Cook County Circuit Court house in courtroom 101, 2600 South California Avenue, Chicago, Illinois and show cause why he should not be held in contempt of this Court for failure to appear and answer a subpoena signed by Judge Leroy K. Martin-1844. Faulkner appeared on May 23, 2016; however Judge Leroy K. Martin did not know that Faulkner had appeared due to his order. Judge Leroy K. Martin stated that the proceeding was had on a motion by the plaintiff in case caption:

PEOPLE OF THE STATE OF ILLINOIS)	CONTEMPT OF COURT
)	VIS-À-VIS .
vs.)	
)	APRIL 2016 Grand Jury
MARVIN FAULKNER)	#705

d). Faulkner is intimidated with great fear of the Defendant(s) in their great power to destroy not only properties but lives.

XVII. DISCOVERY RULE AND FRAUDULENT CONCEALMENT

177. Plaintiffs hereby affirmatively plead the discovery rule and would show that Plaintiffs’ claims are not barred by limitations and accrued only when Plaintiffs discovered or, in the exercise of reasonable diligence, should have discovered the facts giving rise to their causes of action.

a). Plaintiffs hereby affirmatively plead fraudulent concealment and would show that Plaintiffs’ claims are not barred by limitations and accrued only when Plaintiffs discovered the Defendant(s)’ fraudulent concealment of the facts giving rise to

Plaintiff(s)' causes of actions.

XVIII. JURY DEMAND

178. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff(s) hereby demands a trial by jury on all issues tribal/trial by jury.

a). Plaintiffs request this case be decided by a jury, and the appropriate jury fee has been paid by the Plaintiffs.

XIX. REQUESTED RELIEF

179. Plaintiffs request Defendants to be cited to appear and answer and that they have judgment for their damages, treble damages, punitive damages, costs, interest, attorney's fees, relief under 18 USC §1964(a) and any other relief to which they may show themselves entitled.

a). Due to additional information has been searched and not yet received of documents, exhibits and facts, not yet plead, herein. Plaintiff(s) requests additional time to supplement and/or amended this "*Amended Verified Complaint*". Additional title violations and additional common law claims have not yet been inclusive of this "*Amended Verified Complaint*". And, if discovery is not granted for any reason and/or request for dismissal of this "*Amended Verified Complaint*" is requested by any party or entity of this matter and upon Plaintiffs' request; Plaintiff(s) calls for dismissal of the "*Amended Verified Complaint*" without prejudice by this Honorable Court.

XX. CLAIM FOR RELIEF

180. *WHEREFORE*, Plaintiffs, on behalf of themselves respectfully request that the Court;

- A. Enter judgments against each of the Defendant and in favor of the Plaintiffs and each of the respective violations of RICO and/or common law issues;
- B. Award the Plaintiffs actual and compensatory damages, trebled, in an amount to be determined at trial;
- C. Award the Plaintiffs restitution or disgorgement of ill-gotten gains, as appropriate;
- D. Award the Plaintiffs exemplary and/or punitive damages predicated on their claim for fraud, as allowed by law;
- E. Award the Plaintiffs their costs of suit, including reasonable attorneys' fee, as provided by law;
- F. Award the Plaintiffs prejudgment and post-judgment interest, as allowed by law
- G. For appropriate declaratory relief regarding the unlawful and unconstitutional acts and practices of the [Defendant/Defendants].
- H. For appropriate equitable relief against all Defendants as allowed by the Civil Rights Act of 1871, 42 U.S.C. §1983, including the enjoining and permanent restraining of these violations, and direction to the Defendants to take such affirmative action as is necessary to ensure that the effects of the unconstitutional and unlawful practices are eliminated and do not continue to affect the plaintiffs' or others'.
- I. Award such further and additional relief as the Court deems just and proper.

COUNT I – RICO (Violations of RICO, 18 U.S.C. § 1962(C))

VIOLATION OF 18 U.S.C. § 1962(d))

[Violation of Plaintiffs' Federal and Legal Rights against Defendant(s): Anna M. Loftus; William Farrow; Michael A. Eurich; George F. Scully Jr.; Elizabeth Lyons; Darryl B. Simko; Alfred M. Swanson Jr.; Michael N. Varak; Bryan Gomez; Meredith Freeman; Edward J. Lesniak; Alexander D. Marks; Palmela Mclean Meyerson; Raymond W. Mitchell; Irwin J. Solganick; Alexander P. White; Timothy L. Rowell; Sonia

Pasquesi; John Avgerinos; Paul Avgerinos; Samantha L. Babcock; Steven E. Anderson and Erik Hubbard]

181. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

182. [Defendant/Defendants] [has/have] acted under the color of law when [Defendant/Defendants] deprived Plaintiff of [his/their] federal rights, property interests and otherwise discriminated against [Plaintiff/Plaintiffs] based upon the illicit acts by the [Defendant/Defendants].

183. As a direct and proximate result of [Defendant/Defendants] *Violation of Rico* [violations of Rico, 18 U.S.C. §1962[C] & violation of §18 U.S.C. §1962[D]], [Plaintiff/Plaintiffs] [has/have] sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this “*Verified Complaint*”.

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

FRAUD
CONSPIRACY TO VIOLATE RICO,

A. Defendant(s) conduct as described above constitutes common law fraud. Plaintiffs incorporate all allegations of fraud in their RICO claim into this claim and hereby assert a claim for fraud and recovery of actual and punitive damages.

2. Defendant(s), either directly or through their agents or as part of the overall

conspiracy as described herein misrepresented the benefits against Plaintiffs.

3. These misrepresentations were made either willfully, or alternatively, negligently without regard for their truth. The misrepresentations were intended by Defendants to be relied on by Plaintiffs. Defendant(s) willfully, or alternatively, negligently, prevented plaintiffs from fully understanding the truth in order to prevent Plaintiffs from discovering the various misrepresentations and fraud, or alternatively, negligence as alleged herein.

4. Defendant(s) also fraudulently and intentionally concealed material facts from Plaintiff(s) for the purpose of inducing Plaintiff(s) to engage in the mortgages pursuant to the Defendant(s)' deceptive marketing scheme. Said concealment by the Defendants was calculated, willful and intentional and renders Defendant(s) liable to Plaintiffs for actual and punitive damages as though said Defendant(s) had affirmatively stated the non-existence of the matters said Defendant(s) concealed. The acts of said Defendant(s) as aforesaid render said Defendant(s) liable to Plaintiffs and causes of action are hereby stated for fraudulent concealment.

5. Defendants' conduct constitutes a civil conspiracy thereby making all and/or some of the Defendant(s) equally liable for the conduct of all and/or some other Defendant(s) jointly and severally acts.

184. As a direct and proximate result of the **[Defendant/Defendants]** violations of **[Plaintiff/Plaintiffs]** constitutional rights, **[Plaintiff/Plaintiffs]** **[has/have]** suffered severe and substantial damages. These damages include loss of income, loss of benefits, lost of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation,

intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (\$4,905,771.87) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

AND, Plaintiffs prays for judgment against Defendant(s), herein listed above in count I, and each of them as follows:

1. For threefold the damages actually sustained and the costs of suit, in a sum not less than Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents [\$4,905,771.87], including a reasonable attorney's fee, (if applicable) pursuant to 18 USCA §1964 (c) with interest there at the rate of Seven percent (7%) per annum;
2. For such other and further relief as the Jury/Court may deem appropriate pursuant to 18 USCA §1964;
3. For such other and further relief as the Jury/Court may deem appropriate pursuant to 18 USCA §1964;

COUNT II - 42 U.S.C. § 1983

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

185. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

186. **[Defendant/Defendants] [has/have]** acted under the color of law when **[Defendant/Defendants]** deprived Plaintiff of **[his/their]** federal rights, property interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

187. As a direct and proximate result of **[Defendant/Defendants]** *Violation of 42 U.S.C. §1983*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s). Judge was hired by the State as an officer of the Court to protect the public from injustice and did not.

188. That continually from the period of 2008 and 2016 of this "*Amended Verified Complaint*" Defendants' plot to destroy the Plaintiffs; because the Plaintiffs preformed and exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendants, as aforementioned.

189. The Defendant(s), herein, both directly and indirectly, individually and through its

agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

190. That during the period of 2008 thru 2016 of this "*Amended Verified Complaint*" Plaintiff(s) filed this the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Defendants on many occasion, Plaintiffs had made aware to the Defendant(s) of the harm and fear the Plaintiffs have of the Defendant(s).

191. That the Defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) derivation of Plaintiffs their Constitutional Rights, Privileges that are/is secured by laws in a continuous manner plot/plotted against the Plaintiffs to fulfill their conspiracy to defraud the Plaintiffs and the Plaintiffs way of life.

b). Defendant(s) in their reckless and direct acts caused Plaintiffs irreversible harm, as set forth in this "*Amended Verified Complaint*". (*But, not limited to*).

192. That by reason of the set forth in the "*Amended Verified Complaint*" of paragraphs above as a result of the aforesaid intention and directly or indirectly, of the said Defendant(s), as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

193. As a direct and proximate result of the [Defendant/Defendants] violations of [Plaintiff/Plaintiffs] constitutional rights, [Plaintiff/Plaintiffs] [has/have] suffered severe and substantial damages. These damages include loss of income, loss of benefits, lost of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (\$4,905,771.87) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT III - 18 U. S. C § 242

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

194. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

195. [Defendant/Defendants] [has/have] acted under the color of law when [Defendant/Defendants] deprived Plaintiff of [his/their] federal rights, property

interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

196. As a direct and proximate result of **[Defendant/Defendants]** *Violation of 18 U.S.C. §242*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this “*Amended Verified Complaint*”.

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

197. That continually from the period of 2008 and 2016 of this “*Amended Verified Complaint*” Defendant(s), as a result that, the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendant(s), as aforementioned.

198. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

199. That during the period of 2008 thru 2016 of this “*Amended Verified Complaint*” Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the Defendant(s) on many occasion, Plaintiffs had warned the Defendant(s) their harm to the Plaintiffs.

200. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) acts towards/to the Plaintiffs due to the Plaintiffs color and/or race being: African American is Unconstitutional under United States Laws.

b). Plaintiff(s) [as Anna M. Loftus said to Faulkner: “Nigger, I’m going to enjoy destroying you!!!” on February 03, 2015] is being punished for being African American.

201. That by reason of the set forth in the “*Amended Verified Complaint*” of paragraphs set forth above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

202. As a direct and proximate result of the [Defendant/Defendants] violations of [Plaintiff/Plaintiffs] constitutional rights, [Plaintiff/Plaintiffs] [has/have] suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven

Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT IV - HATE CRIME: 18 U. S. CODE § 249
 Violation of Plaintiffs' Federal and Legal Rights
 (Against all Defendants)

203. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

204. **[Defendant/Defendants] [has/have]** acted under the color of law when **[Defendant/Defendants]** deprived Plaintiff of **[his/their]** federal rights, property interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

205. As a direct and proximate result of **[Defendant/Defendants]** *Violation of Hate Crime*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap

by the Defendant(s).

206. That continually from the period of 2008 and 2016 of this "*Amended Verified Complaint*" Defendant(s), as a result that, the plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendant(s), as aforementioned.

207. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the plaintiffs.

208. That during the period of 2008 thru 2016 of this verified complaint plaintiff filed this the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the plaintiffs from the defendants on many occasion, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiff(s).

209. That the defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) willfully created the Plaintiff(s) to suffer that the Plaintiff(s) have not found a white people/person to have/has suffered.

b). Defendant(s) have systematically orchestrated the demise of the Plaintiffs way of life primarily believed by Plaintiff(s) is/are due to Plaintiffs being African Americans.

210. That by reason of the set forth in the "*Amended Verified Complaint*" of paragraphs set forth above of the aforesaid intention and directly or indirectly, of the said Defendant(s), as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was

caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

211. As a direct and proximate result of the [Defendant/Defendants] violations of [Plaintiff/Plaintiffs] constitutional rights, [Plaintiff/Plaintiffs] [has/have] suffered severe and substantial damages. These damages include loss of income, loss of benefits, lost of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT V – § 1981– CIVIL RIGHTS VIOLATIONS

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

212. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

213. **[Defendant/Defendants] [has/have]** acted under the color of law when **[Defendant/Defendants]** deprived Plaintiff of **[his/their]** federal rights, property interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

214. As a direct and proximate result of **[Defendant/Defendants]** *Violation of §1981-Civil Rights Violations*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this “*Amended Verified Complaint*”.

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

215. That continually from the period of 2008 and 2016 of this “*Amended Verified Complaint*” Defendants, as a result that, the plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the defendants, as aforementioned.

216. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and

permitted said harm to become and remain against the plaintiffs.

217. That during the period of 2008 thru 2016 of this "*Amended Verified Complaint*" Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the defendants on many occasion, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiffs.

218. That the Defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) refused and plotted to defraud Plaintiffs of their civil liberties equal and full benefits under laws, in which the Plaintiffs relied on of the Defendant(s).

b). Plaintiffs were signal out by the Defendant(s) of extreme harm, pain, punishment by the Defendant(s) for Plaintiffs' aggressive legal litigation.

219. That by reason of the set forth in this "*Amended Verified Complaint*" of paragraphs above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

220. As a direct and proximate result of the **[Defendant/Defendants]** violations of **[Plaintiff/Plaintiffs]** constitutional rights, **[Plaintiff/Plaintiffs]** **[has/have]** suffered severe and substantial damages. These damages include loss of income, loss of benefits,

lost of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT VI - § 1985 (3) DEPRIVATION

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

221. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

222. **[Defendant/Defendants] [has/have]** acted under the color of law when **[Defendant/Defendants]** deprived Plaintiff of **[his/their]** federal rights, property interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

223. As a direct and proximate result of **[Defendant/Defendants]** Violation of §1985

(3) *Deprivation*, [Plaintiff/Plaintiffs] [has/have] sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Amended Verified Complaint*".

c. The Plaintiff believe that their telephones and computers are being tap by the Defendant(s).

224. The circuit court judges knew that he lost all immunity as a Judges when he participated in criminal acts, aiding, assisting or conniving with others who perform a criminal act in their administrative/ministerial duties.

225. That continually from the period of 2008 and 2016 of this "*Amended Verified Complaint*" Defendant(s), as a result that the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the defendants, as aforementioned.

226. The defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the plaintiffs.

227. That during the period of 2008 thru 2016 of this "*Amended Verified Complaint*" Plaintiff(s) filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the defendants on many occasion, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiffs.

228. That the Defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) conspired to intimidate the Plaintiffs, as set forth, herein, to directly or indirectly take away Plaintiffs' protection under the laws by the Defendant(s) threat on the Plaintiffs using *color of law* for Defendant(s) ill-gotten gain.

229. That by reason of the set forth in the "*Amended Verified Complaint*" of paragraphs, above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

230. As a direct and proximate result of the [Defendant/Defendants] violations of [Plaintiff/Plaintiffs] constitutional rights, [Plaintiff/Plaintiffs] [has/have] suffered severe and substantial damages. These damages include lost of income, lost of benefits, lost of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual

damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT VII - INTENTIONAL TORT

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

231. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

232. [Defendant/Defendants] [has/have] acted under the color of law when [Defendant/Defendants] deprived Plaintiff of [his/their] federal rights, property interests and otherwise discriminated against [Plaintiff/Plaintiffs] based upon the illicit acts by the [Defendant/Defendants].

233. As a direct and proximate result of [Defendant/Defendants] *Violation of Intentional Tort*, [Plaintiff/Plaintiffs] [has/have] sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

234. That continually from the period of 2008 and 2016 of this “*Amended Verified Complaint*” Defendant(s), as a result that, the plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendant(s), as aforementioned.

235. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

236. That during the period of 2008 thru 2016 of this “*Amended Verified Complaint*” Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the plaintiffs from the defendants on many occasions, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiffs.

237. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) of their free minds and bodies plotted against Plaintiffs for the purpose to defraud Plaintiffs’ properties and gains for the use of the Defendant(s).

b). Defendant(s) knew or should have known that the harm the Defendant(s) perpetrated against the Plaintiffs would cause extreme harm to the Plaintiffs.

238. That by reason of the set forth in this “*Amended Verified Complaint*” of paragraphs, above as a result of the aforesaid intention and directly or indirectly, of the said Defendant(s), as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life,

bodies, financial depletion, their reputation, their ability of life, liberty and the pursuit of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

239. As a direct and proximate result of the [Defendant/Defendants] violations of [Plaintiff/Plaintiffs] constitutional rights, [Plaintiff/Plaintiffs] [has/have] suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT VIII - INTIMIDATION

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

240. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates

each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

241. **[Defendant/Defendants] [has/have]** acted under the color of law when **[Defendant/Defendants]** deprived Plaintiff of **[his/their]** federal rights, property interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

242. As a direct and proximate result of **[Defendant/Defendants]** *Violation of Intimidation*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this “*Amended Verified Complaint*”.

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

243. That continually from the period of 2008 and 2016 of this “*Amended Verified Complaint*” Defendant(s), as a result that, the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendants, as aforementioned.

244. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

245. That during the period of 2008 thru 2016 of this “*Amended Verified Complaint*”

Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the defendants on many occasions, Plaintiffs had warned the Defendant(s) of their harm, to the Plaintiffs.

246. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Plaintiffs directly of effect of the acts of the Defendant(s) made or had the Plaintiffs arrested and degraded the Plaintiffs by people with guns, and on occasion said people holding the handle of their gun while looking at the Plaintiff(s).

b). Defendant(s) threaten and is threatening Plaintiffs liberty, lives and enjoyment of life aiming to hurt or embed fear in the Plaintiff(s) for their aggressive legal litigations.

247. That by reason of the set forth in this "*Amended Verified Complaint*" of paragraphs, above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

248. As a direct and proximate result of the **[Defendant/Defendants]** violations of **[Plaintiff/Plaintiffs]** constitutional rights, **[Plaintiff/Plaintiffs]** **[has/have]** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business

opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT IX - PIERCED CORPORATE VEIL

Violation of Plaintiffs' Federal and Legal Rights (Against Defendants: Pierce & Associates; Federal Deposit Insurance Corp; Urban Partnership Bank; ShoreBank; Jenner & Block LLP; Chuhak & Tecson, P.C.; Villa Capital Properties; City of Chicago; LaSalle Bank National Mortgage Electronic Registration Systems; Encore Credit; EMC Mortgage Corporation; Bear Stearns Asset Backed Securities I LLC; Nationstar mortgage, LLC.; Citimortgage, Inc., Federal National Mortgage Association; First Franklin Mortgage; US Bank National Associates; Kovitz, Shifrin & Nesbit Law Office; Burke, Warren, Mackey & Serritella, P.C.; Christina Place II Condominium Association; Starr, Bejgiert, Zink & Rowells; Codilis & Associates; Cook County Sheriff's Police Department and Hauselman, Rappin & Olswang, Ltd)

PIERCED CORPORATE VEIL

249. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

250. [Defendant/Defendants] [has/have] acted under the color of law when

[Defendant/Defendants] deprived Plaintiff of [his/their] federal rights, property interests and otherwise discriminated against [Plaintiff/Plaintiffs] based upon the illicit acts by the [Defendant/Defendants].

251. As a direct and proximate result of [Defendant/Defendants] *Violation of Pierced Corporate Veil*, [Plaintiff/Plaintiffs] [has/have] sustained injuries and/or damages.

(a). In this cause-of-action, the Plaintiffs seek that the “*corporate veil(s)*” are pierced, in this action, so that the corporations cannot be regarded as a legal entity separate from its shareholders.

(b). Plaintiffs seek that the court hold the individuals (whether officer, director, shareholder, parent corporation, and/or subsidiary), personally liable.

(c). Plaintiffs seek that the court treat the individual defendants as within the alter ego doctrine and find each of the defendants personally liable for the claims in this action and damages as addressed herein.

(d). The defendant corporations were so controlled as the *alter ego* or mere instrumentality of its owners were established for the purposed of committing fraud, deception, bad faith, abuse of the corporate forum, to defraud the government, breach the public trust, unjust enrichment, abuse of power, visiting injustice upon Plaintiffs, but not limited thereto.

(e). This case involves many federal questions and some of the claims deal with racketeering, conspiracy, corruption, fraud, but not limited thereto.

(f). The individual defendants should be made personally liable for damages caused by a corporation’s of a federal statute and the veils should be pierced.

(g). On information and belief, there are causes-of-action in this case arising under

federal statutes, issues of public policy, and possibly federal and/or state public funds are involved, but not limited thereto.

(h). On information and belief, there was a high interdependency of business operations in the form of formal and informal consolidation of financial, strategic, legal, and human resources operations, but not limited thereto.

(i). It is inequitable for the defendants to be allowed to invoke the corporate shield and avoid financial obligations.

(j). The corporate veil should be pierced to treat the defendant corporations' acts as if done by those actually controlling the corporations, in the interests of public convenience, fairness, equity, but not limited thereto.

(k). On information and belief, there is a unity of interest, ownership, and benefit separate personalities of the corporation and its corporate shareholders no longer exist.

(l). the acts of the defendant corporations should not be treated as those of the corporation alone.

(m). If the defendant corporations were to be treated as those of the corporation alone, then an inequitable result will follow and this equitable remedy *doctrine* of piercing the corporate veil should be granted to achieve an equitable result.

(n). On information and belief, the parent, subsidiary, and/or affiliate corporations, have the following in common, but not limited thereto: (1). benefactors; (2). contracts; (3). stock ownership; (4). directors or officers; (5). business departments; (6). consolidated financial statements and/or tax returns; (7). parent finances the subsidiaries and/or affiliates; (8). parent caused the incorporation of the subsidiaries and/or affiliates; (9). operations of grossly inadequate capital (undercapitalization); (10). parent and/or

affiliates pay the salaries and other expenses of the subsidiaries and/or affiliates; (11). the subsidiary receives no business except that given to it by the parent and/or the affiliate corporations; (12). the parent uses the subsidiary's property as its own; (13). the daily operation of the corporations are not kept separate; and (14). the subsidiary does not observe the basic corporate formalities (such as keeping separate books and records as well as holding shareholder and board meetings, but not limited thereto).

(o). On information and belief, there are interlocking directors and officer positions between the parent, subsidiaries, and/or affiliate corporations; intercompany agreements, contracts, ownerships, benefactors, but not limited thereto.

(p). On information and belief, there is substantial control by the parent entity defendant corporations over the finances, policies and practices of the subsidiary and/or affiliate corporations to such a degree that the parent entity operates the controlled corporation merely as its business conduit or agent.

(q). On information and belief, the alter ego analysis/test is the same under state or federal law; there is abuse of the corporate form and this court should employ the tool of equity known as *veil-piercing*.

(r). On information and belief, the court may disregard the corporate entity and hold a corporation's shareholders personally liable for the acts and debts of the corporation's (whether parent, subsidiaries, affiliated companies, but not limited thereto).

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven

Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT X - UNJUST ENRICHMENT

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

252. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

253. **[Defendant/Defendants]** **[has/have]** acted under the color of law when **[Defendant/Defendants]** deprived Plaintiff of **[his/their]** federal rights, property interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

254. As a direct and proximate result of **[Defendant/Defendants]** *Violation of Unjust Enrichment*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Amended Verified Complaint*".

c. The Plaintiff believe that their telephones and computers are being tap by the Defendant(s).

255. Defendant(s) obtained funds and/or profits from the plaintiff(s) by fraud

perpetrated by the Defendants and the taking of undue advantage of the Plaintiffs in the manner described above. Defendants' conduct gives rise to a cause of action on behalf of Plaintiffs under the equitable remedy of unjust enrichment, which cause of action is hereby stated.

256. That continually from the period of 2008 and 2016 of this "*Amended Verified Complaint*" Defendants, as a result that, the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendant(s), as aforementioned.

257. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

258. That during the period of 2008 thru 2016 of this verified complaint plaintiff filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the plaintiffs from the defendants on many occasion. Plaintiffs had warned the Defendant(s) of their harm they are perpetrating on the Plaintiffs, to no prevail.

259. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) enriched their stature, financial enlargements and camaraderie from the Defendant(s) plot to defraud and destroy the Plaintiffs.

b). Defendant(s) received benefit and favors of the system that surpassed the rights of the regular citizens by the rules of law; for their plot against the Plaintiffs.

260. That by reason of the set forth in the “*Amended Verified Complaint*” of paragraphs above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

261. As a direct and proximate result of the [Defendant/Defendants] violations of [Plaintiff/Plaintiffs] constitutional rights, [Plaintiff/Plaintiffs] [has/have] suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney’s fees and costs (*if applicable*) and any other just

remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT XI – § 1986 CONSPIRACY

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

262. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

263. **[Defendant/Defendants] [has/have]** acted under the color of law when **[Defendant/Defendants]** deprived Plaintiff of **[his/their]** federal rights, property interests and otherwise discriminated against **[Plaintiff/Plaintiffs]** based upon the illicit acts by the **[Defendant/Defendants]**.

264. As a direct and proximate result of **[Defendant/Defendants]** *Violation of §1986 Conspiracy*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this “*Amended Verified Complaint*”.

c. The Plaintiff believe that their telephones and computers are being tap by the Defendant(s).

265. That continually from the period of 2008 and 2016 of this “*Amended Verified Complaint*” Defendants, as a result that, the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the defendants, as aforementioned.

266. The Defendant(s), herein, both directly and indirectly, individually and through its

agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

267. That, during the period of 2008 thru 2016 of this "*Amended Verified Complaint*" plaintiff filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the Defendant(s) on many occasion, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiffs.

268. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) in their capacity being learned in the laws, conspired to destroy the Plaintiffs and take Plaintiffs way of life; breaching of their fiduciary duties inherent in their positions and the Defendant(s) refusal of their reasonable aid for the Plaintiffs to prevent the extreme harm from and by the Defendant(s).

269. That by reason of the set forth in the "*Amended Verified Complaint*" of paragraphs, above as a result, of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

270. As a direct and proximate result of the [Defendant/Defendants] violations of

[Plaintiff/Plaintiffs] constitutional rights, [Plaintiff/Plaintiffs] [has/have] suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT XII – EMOTIONAL DISTRESS

Violation of Plaintiffs' Federal and Legal Rights
(Against all Defendants)

271. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

272. [Defendant/Defendants] [has/have] acted under the color of law when [Defendant/Defendants] deprived Plaintiff of [his/their] federal rights, property interests and otherwise discriminated against [Plaintiff/Plaintiffs] based upon the illicit

acts by the **[Defendant/Defendants]**.

273. As a direct and proximate result of **[Defendant/Defendants]** *Violation of Emotional Distress*, **[Plaintiff/Plaintiffs]** **[has/have]** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this “*Amended Verified Complaint*”.

c. The Plaintiffs telephones and computers appears tapped.

274. That continually from the period of 2008 and 2016 of this “*Amended Verified Complaint*” defendants, as a result that, the Plaintiffs exercised their Constitutional, State and Local Rights to defend themselves and their properties against corruption against the Defendants, as aforementioned.

275. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

276. That during the period of 2008 thru 2016 of this “*Amended Verified Complaint*” Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the defendants on many occasion, Plaintiffs had warned the Defendant, of their harm to the Plaintiffs.

277. That the Defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) in their conspiracy/plot to defraud Plaintiffs by damaging the Plaintiffs' way of life of the Defendant(s)' intimidation, using color of law to aid the goals of the Defendants' purpose of ill-gotten gain forced the Plaintiffs to become afraid of everyday life, file bankruptcy, increase stress to the Plaintiffs, for Plaintiffs' aggressive legal litigation to defend Plaintiffs' person and properties.

278. That by reason of the set forth in this "*Amended Verified Complaint*" of paragraphs, above as a result, of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

279. As a direct and proximate result of the **[Defendant/Defendants]** violations of **[Plaintiff/Plaintiffs]** constitutional rights, **[Plaintiff/Plaintiffs]** **[has/have]** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

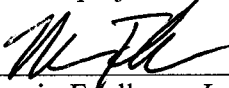
WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. **(TO BE DETERMINED)** in compensatory damages. Fourteen Million Seven

Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

DATE: July 11, 2016

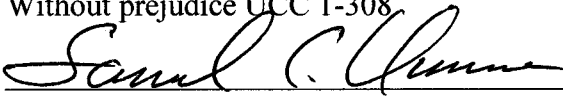
Respectfully submitted,

Without prejudice UCC 1-308


Marvin Faulkner, *Lead Plaintiff*

Marvin Faulkner, *Plaintiff*
828 North Ridgeland Ave.
Oak Park, Illinois 60302
1.312.404.3757
E-mail: mfaulkner@endjudicialcorruption.org

Without prejudice UCC 1-308


Samuel C. Umunna, *Co-Plaintiff*


Samuel C. Umunna, *Plaintiff*
8800 South Longwood Drive
Chicago, Illinois 60643
1.773.575.3630
E-mail: samummuna@juno.com

VERIFICATION

Under penalties as provided by law, Marvin Faulkner, Plaintiff, states that he has read the foregoing *Amended Verified Complaint* and on the basis of personal knowledge, the review of relevant documentation and discussion with knowledgeable personnel certifies that the statements set forth therein are true and correct, except as to

matters therein stated to be on information and belief and as to such matters, the undersigned, on behalf of Plaintiff, certifies as aforesaid that the undersigned verily believes the same to be true.

Without prejudice UCC 1-308



Marvin Faulkner, Plaintiff

VERIFICATION

Under penalties as provided by law, Samuel C. Umunna, Plaintiff, states that he has read the foregoing *Amended Verified Complaint* and on the basis of personal knowledge, the review of relevant documentation and discussion with knowledgeable personnel certifies that the statements set forth therein are true and correct, except as to matters therein stated to be on information and belief and as to such matters, the undersigned, on behalf of Plaintiff, certifies as aforesaid that the undersigned verily believes the same to be true.

Without prejudice UCC 1-308



Samuel C. Umunna, Plaintiff

ORIGINAL

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MARVIN FAULKNER, *et. al.*,) CIVIL ACTION
[Plaintiff(s) herein, come) Case No.: 16-cv-2432
Individually of themselves];)
Plaintiff(s),) Judge: John W. Darrah
v.) Mag.: Judge Finnegan
ANNA M. LOFTUS, *et. al.*,)
[All government Defendant(s) are)
Being sued in his/her Individual)
and/or their Official capacity],)
Defendant(s),) **Plaintiffs' Demand**
for a Trial by Jury


FILED

JUL 11 2016

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

NOTICE OF FILING

Case No.: 16-cv-2432

TO DEFENDANT(S) AND/OR THE ATTORNEY OF RECORD: see "Service List"

PLEASE TAKE NOTICE that on July 11, 2016, I/we or us shall file the In the United States District Court for the Northern District of Illinois, Eastern Division, at 219 South Dearborn Street, Chicago, Illinois, and then and there present the attached filing: "AMENDED VERIFIED COMPLAINT" a true and correct copy of which was filed and served upon you publicly on July 11, 2016.

Respectfully submitted,



Marvin Faulkner, Plaintiff

and



Samuel C. Umunna, Plaintiff

Marvin Faulkner, Plaintiff
828 North Ridgeland Avenue
Oak Pak, Illinois
1.312.404.3757

Samuel C. Umunna, Plaintiff
8800 South Longwood Dr.
Chicago, Illinois 60643
1.773.575.3630

ORIGINAL

CERTIFICATE OF SERVICE

Case No.: 16-cv-2432

I/we hereby certify that a copy of the "*AMENDED VERIFIED COMPLAINT*" was served upon all counsel of record via ECF and/or U.S. Mail on 07/11/2016 of the defendants with this court.

PLAINTIFF(S):

Marvin Faulkner

828 North Ridgeland Ave.,

Oak Park, Illinois 60302

Cell: 1(312) 404-3757

Tele: 1(773) 413-7096

Fax: 1(773) 413-7496

mfaulkner@endjudicialcorruption.org

Samuel C. Umunna

8800 South Longwood Dr.

Chicago, Illinois 60643

Cell: 1(773)575-3757

sammummuna@juno.com

DEFENDANT(S):

Pierce & Associates, P.C.

1 North Dearborn, 13th Floor

Chicago, Illinois 60602

312-946-3088

PLEADINGS@PIERCEDERVICES.COM / Brian.Merfeid@PierceServices.com

for: Meredith Freeman, Pierce & Associates., Pc. and Michael N. Varak

Cc.,

United States Department of Justice

United States Marshall

F.B.I.

Attorney General

Deputy Attorney General

Assistant Attorneys General

Illinois Attorneys General

Mayor Rahm Emanuel

Cook County Sheriff's Police Department

City of Chicago Police Department

Village of Oak Park Police Department
Honorable Timothy C. Evans, Chief Judge of the Circuit Court of Cook County
Samuel Adams Jr., *Attorney at Law*
Josh Niewoehner, *Attorney at Law*
Rev. Jesse Jackson Sr., Rainbow Push Coalition
Rev. Al Sharpton, National Action Network
Judicial Watch
End Judicial Corruption Association

/s/ Marvin Faulkner

Marvin Faulkner
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